

Hearing Date: No hearing scheduled  
Courtroom Number: No hearing scheduled  
Location: No hearing scheduled

FILED  
2/27/2019 7:28 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2007CH29738

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC ) Case No.: 2007 CH 29738  
Plaintiff, ) (Transfer to Law Division)  
) In re: 1-18-0091 (appellate file)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

**Rule 321 motion to limit Contents of the Record on Appeal**

**NOTICE:** Defendant, Gordon Wayne Watts, no longer resides in Lakeland, Florida, and his new contact information is Gordon Wayne Watts, 2046 Pleasant Acre Drive, Plant City, FL 33566-7511 (H:863-687-6141, C:863-688-9880)

This Rule 321 motion comes to the court pursuant to the order of the District Court of Appeal, First District, ILLINOIS, dated, OCT 25 2018 **[Exhibit-A]**, which directed that “Appellant must direct inquiries on the content of [the] record on appeal to [the] clerk of the circuit court of Cook County.”

CAVEAT: It is on record and clearly documented that This Court has *previously* received timely motions of this type, but in violation of Federal Procedural Due Process, This Court didn't review on the merits nor rule on prior motions, such as the timely-filed motion to Intervene dated 7-7-2017 **[Exhibit-F]**, and on file with this court, nor did it rule on the timely Rule 321 Motion Electronically-filed on “4/20/2018 6:34 PM,” in this case **[Exhibit-C]**, in the CIRCUIT COURT OF COOK COUNTY, ILLINOIS LAW DIVISION, which Defendant-Appellant filed pursuant to the ORDER ENTERED MARCH 28, 2018, Appellate Court, First District. **In refusing to rule on the 4/20/18 motion, supra, This Court, effectively disobeyed the appeals court, since the appeals court clearly did not ask defendant, Watts, to file a motion with the intent that it get ignored, violating Federal Procedural Due Process, as well** (not to mention something that gives This Court a bad name). Furthermore, in doing so, it's clear that the only possible motive for such extreme action would be to protect Joseph Younes, an influential local attorney, by refusing to rule against him or return Daniggelis' house to its rightful owner. But, This Court does itself no favours when it continues to protect a documented trouble-maker, who's been an embarrassment to the legal profession (and court), when local news media has continued to write about how he took the house (which he obtained via documented mortgage fraud) & attempt to **illegally demolish it** as shown in at least nine(9) recent news items [click-able *DNAinfo* links]:

[1] [“‘Rotted’ Historic Building In Old Town Triangle Could Be Seized By City,”](#) by Ted Cox, *DNAinfo*, Mar 30, 2017

[2] [“‘Rotted’ Old Town Triangle House Owner Faces Daily \\$1K Fine As Charges Fly,”](#) by Ted Cox, *DNAinfo*, Apr 07, 2017

[3] [“‘Rotted’ Old Town House Slated For Repairs As Fines Threatened Again,”](#) by Ted Cox, *DNAinfo*, Apr 28, 2017

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[4] [“Owner Of 'Rotted' Old Town Home Threatened With \\$150,000 Fine,”](#) by Ted Cox, DNAinfo, Jul 07, 2017

[5] [“Owner Of 'Rotted' Old Town House Faces 'Significant Fines,' City Says,”](#) by Ted Cox, DNAinfo, Jul 13, 2017

[6] [“'Rotted' Old Town House Cleared For Repairs,”](#) by Ted Cox, DNAinfo, Jul 20, 2017

[7] [“'Rotted' Old Town House Owner Given 45 Days To Come Up With Repair Plan,”](#) by Ted Cox, DNAinfo, Sept 01, 2017

[8] [“Landmarks commission still threatening fines if house in historic district isn't worked on once building permit is issued,”](#) by Ted Cox, ChicagoCityscape, Nov 09, 2017

[9] [“CHICAGO, IL: Mortgage Fraud,”](#) by Gordon Wayne Watts, The Register, Fri. 14 Apr. 2017; UPDATED Sat. 05 May 2018.

Links: <https://GordonWatts.com/index.html#MortgageFraud-2017UPDATES>

and: <https://GordonWayneWatts.com/index.html#MortgageFraud-2017UPDATES>

\* **Bonus:** This doesn't even count numerous embarrassments that Defendant, Paul Shelton (who was Younes' law partner), brought the legal profession, when he lost his law license in the Lessie Towns case, for similar mortgage fraud, garnering embarrassment to both lawyers & court:

[10] “And Paul Shelton\_of Trust One Mortgage has agreed to a consent order that bans him for life from any work originating loans...“Lifetime bans are never issued without cause. There are always reasons for lifetime bans,” said [Brent] Adams, [Illinois Department of Financial and Professional Regulation secretary].” Source: “Victory for South Side victim of mortgage fraud,” *ABC Local*, WLS-TV/DT; Date: Friday, November 19, 2010, URL: <http://abclocal.go.com/story?section=news/local&id=7799653>

[11] See also: “While mom took care of others, she got taken,” *Chicago Tribune*, May 10, 2009, By John Kass: URL: [http://articles.chicagotribune.com/2009-05-10/news/0905090103\\_1\\_trust-bungalow-house-payments](http://articles.chicagotribune.com/2009-05-10/news/0905090103_1_trust-bungalow-house-payments)

It damages the court's reputation when it protects Younes, a man who is documented (in Judge Otto's 3-8-2013 order in this case[[\*\*]]) to have used a forgery to execute mortgage fraud theft of elderly Daniggelis' house, land, and equity, documented to be hundreds of thousands of dollars:

To show partiality in judgment is not good: Whoever says to the wicked, “You are in the right,”... Whoever says to the guilty, “You are innocent,” will be cursed by peoples and denounced by the public; nations will abhor him as corrupt. [[\*\*]]Note: Otto admits (Order, p.4, top of page, **[Exhibit-D]**) that the July 9, 2006 warranty deed "is in most respects identical" to the May 9, 2006 warranty deed that Daniggelis signed (except, of course, for the word 'July' being hand-written in), which supports Daniggelis' claims that there was photocopy forgery of his signature, which forgery—all by itself—would void the entire illegal transfer of title.

[12] Nor does this count the illegal rulings by the reviewing court, in which it, *inter alia*, claims that it does not have Mandamus jurisdiction **[Exhibit-L]**, in spite of the clear, plain meaning of Art.6, Sec.6, Ill.Const, and relevant case law. See September 28, 2018 order by reviewing court: “This cause coming on to be heard on the Court's Own Motion, and the Court being advised in the premises;

IT IS HEREBY ORDERED that this Cause is DISMISSED for lack of this Court's jurisdiction.

ORDER ENTERED [] SEP 28 2018 [] APPELLATE COURT, FIRST DISTRICT

Enter:

/s/ Justice Mary Anne Mason

/s/ Justice Terrence J. Lavin

/s/ Justice Michael B. Hyman”

See: **Gassman v. THE CLERK OF THE CIRCUIT COURT OF COOK COUNTY** (1-15-1738) and **Midwest Medical v. Dorothy Brown** (1-16-3230), both of which are examples of Reviewing Court having the authority to issue Mandamus Writs, as Art.6, Sec. 6 of the ILLINOIS CONSTITUTION (sentence 3) clearly says: “The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review,” which, of course, includes Mandamus actions. Gross Error justifies Federal Review of this, as permitted by **Rooker-Feldman, Younger Abstention**, etc., to offer a check & balance against legal discord.

**To assure This Court that a *pro se* (non-lawyer) appellant has enough experience to not be a waste of This Court's time: Even though Appellant, Watts, is not an attorney, he almost won the infamous Terri Schiavo case all by himself, doing even better than former Gov. Jeb Bush [Exhibit-G], and he was the only non-lawyer who one Federal Appeals court allowed to participate in the recent Gay Marriage case. [Exhibit-B] See also, his filings in *Watts v. Flannery, Shelley*, No.123481 before the Illinois Supreme Court in this matter.**

[13] Nor does this count the illegal rulings by the reviewing court, in which it, *inter alia*, claims, in its May 03, 2018 ruling [Exhibit-H], that: “This court has no jurisdiction to order the Cir. Ct. to allow Watts leave to intervene, grant a fee waiver, or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572). Motion denied.

IT IS SO ORDERED.

/s/ Justice Daniel J. Pierce,” **in spite of the fact that Appellate Courts have Rule 321 authority to order a limited record on appeal—or to intervene, as allowable under *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984),...not to mention that this order wrongly denies the inherent Rule Rule 301 jurisdiction of the appeals court—and as allowable under SECTION 6, ARTICLE VI, Constitution of the State of Illinois.**

**In preventing appellant an opportunity to appeal the actions of the circuit court, both the Illinois circuit and appellate State judges are not protected by Federal Judicial Immunity under the highest FEDERAL standards**: “A judge thus remains unquestionably immune as long as he does not take actions that intentionally and plainly prevent further review. The duty imposed on a state-court judge, then, is only to recognize that his own decisions may sometimes be in error and to ensure that orders affecting important constitutional rights can be reviewed in another court.” [“**JUDICIAL IMMUNITY VS. DUE PROCESS: WHEN SHOULD A JUDGE BE SUBJECT TO SUIT?**,” by Robert Craig Waters, page 473, par.3, cl.4—5, **Cato Journal, Vol.7, No.2 (Fall 1987)**. Copyright © Cato Institute. All rights reserved. The author is Judicial Clerk to Justice Rosemary Barkett of the Florida Supreme Court. Emphasis added in bold, underline, italics, for clarity; not in original.]

Cite: <https://www.cato.org/cato-journal/fall-1987>

GMAC v. Watts, 2007 CH 29738 (Law Div.), 1st App.Ct. No: 1-18-0091, Wednesday, 02-27-2019

File: <http://www.cato.org/sites/cato.org/files/serials/files/cato-journal/1987/11/cj7n2-13.pdf>

Cite: <https://ideas.repec.org/a/cto/journal/v7y1987i2p461-474.html>

\* [https://econpapers.repec.org/article/ctojournal/v\\_3a7\\_3ay\\_3a1987\\_3ai\\_3a2\\_3ap\\_3a461-474.htm](https://econpapers.repec.org/article/ctojournal/v_3a7_3ay_3a1987_3ai_3a2_3ap_3a461-474.htm)

Cite: <https://EconPapers.Repec.org/RePEc:cto:journal:v:7:y:1987:i:2:p:461-474>

Circuit court refused to even rule on the 7-7-17 Intervention Motion **(Exhibit-F)**, thus preventing any review, and it also refused to allow appellant to prepare a Record on Appeal that he could afford. The Appeals Court (First District, IL) also refused to ensure that the record on appeal was prepared, even when appellant generously offered to limit the Record on Appeal to approximately twelve (12) items (see proposed Order, **(Exhibit-C)**), sufficient to review the plain—and admitted—forgery fraud. (Judge Otto's order, cited *supra*, admitted duplicate identical signatures, e.g., forgery.) Thus, as infamous vexatious litigant, Robert J. More (a party to this action, by the way) is wont to say, judges have incurred legal liability and are not protected by Judicial Immunity. (However, appellant, Watts, will strive to be polite, diplomatic, and respectful—and carefully document such strong claims. **While appellant, Gordon Wayne Watts, very strongly disagrees with actions of this court and the ones above, he realises that the judges/justices are "real people," who often have a heavy case-load, and will strive to do his part to make their jobs as easy as possible—and show honour & respect, even under duress.**)

The Movant meets all three (3) prongs for Intervention under *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984), *timeliness, inadequacy of representation, and sufficiency of interest, and is qualified to intervene as allowable by 735 ILCS 5/2-408(a)(2) and 735 ILCS 5/2-408(a)(3), as documented in defendant's motion to intervene, dated 7-7-2017, and on file with this court.* Although defendant proved that his interests were not sufficiently represented by Mr. Galic, attorney for Defendant, Richard Daniggelis, in his 7-7-2017 filing, that is even more true now: Mr. Galic, whose motion for 'non-suit' aka voluntary dismissal, was granted by Hon. Diane Shelley, in her 12-07-2017 Order, has been AWOL and totally absent in his promise to Mr. Daniggelis to refile the case within the one-year deadline; therefore, we see that Galic has ensured total & complete “inadequacy of representation” of Watts' documented interests.

Since defendant, Watts, has previously documented that he qualifies to proceed as an indigent **(Exhibit-I)**, he could, legally, request This Court prepare the *entire* record on appeal, and transmit it to the appellate court for review. But, in the interests of fairness to the court (humane treatment and judicial economy), Watts notes that the size of the docket in the underlying Chancery case, in this case number, is huge, and would burden This Court to prepare. Indeed, in the 10-17-2018 “Motion – *En Banc* – for Extension of Time to file Record on Appeal,” which the reviewing court granted **(Exhibit-J)**, defendant quoted Patricia O'Brien, Deputy Chief of Civil Appeals, in which she concurred and admitted, in her Oct 15, 2018 email reply, that: “as you are well aware, this case is eleven years old and was several boxes in size many years ago.” Instead of asking this court to prepare the entire record, defendant instead asks This Court to prepare a Rule 321 limited record with the twelve (12) filings enumerated in the proposed order of the 4/20/2018 motion which defendant, Watts, electronically-filed, and which is on file with this court. **(Exhibit-C)** Defendant, Gordon Wayne Watts, makes a formal request, via this rule 321 motion, to prepare the limited record on appeal, enumerated in his 4-20-2018 filing.

**\*\* APOLOGY and Explanation for slowness in filing \*\***

The above legal arguments seem difficult at best with their references to egregious Federal Civil Rights violations—and possibly even insulting, or disrespectful, even though Defendant, Watts, is **\*\*not\*\*** trying to insult The Court—which would, of course, be just cause to strike the brief, declare it a frivolous/vexatious filing, and of course restrict/deny Watts Redress before the court, as a restricted/denied filer. (And, of course, this would greatly decrease the chances of my motions being considered, reviewed, and relief granted—something you know I want to avoid.) **However, one “last” issue needs to be addressed, and so I will: In a break from “3rd-person” professional language in this motion (and most filings to the court), I, the undersigned Defendant-Appellant-Movant, Gordon Wayne Watts, will apologize to This Court and the appellate court above for slowness in filing this motion today.**

Now, at the circuit court, there are no “hard deadlines” to file the record on appeal (as this court has not issued any order directed to myself with deadlines—indeed, only one judge in this case, Judge Otto, issued *any* orders whatsoever directed to myself, the undersigned Movant, in his humourous Orders dated 10/29/2015 and 12/07/2015, denying my *Amicus*). However, the appellate court generously extended the deadline for filing the record to February 28, 2019 (and this was 10 more days than I had requested, looking at the 02-18-2019 date in my proposed order). Now, I am still “timely” in my filings (and not 'technically' late), as I will likely have both this motion (to the Cook County, IL circuit court) and yet another motion to extend time (to the First Appellate Court) filed by February 28, 2019. Indeed, one friend said that since I am still timely, I shouldn't even waste The Court's time with an apology, as I'm really not “late.”

**However, my slowness in getting back in touch with your court, and making (yet another) request for the record on appeal puts the appeals court at a major inconvenience –and means that your actions will have to be “faster” to make up for my slowness: I “waited until the last minute,” something that (ideally) should have been avoided. So, morally (even if not legally) I owe This Court (and the appeals court) an explanation: As the court has been told before, my father just died, (**Exhibit-K**), and about a month later, I nearly died from a bad reaction to OTC medication (**Exhibit-E**). Moreover, after we were evicted (**Exhibit-M**), the landlady demolished her house, and (of course) forced us to move to the new address. However, the house was in disrepair, and both electric and pump well were not working properly, and we could not take showers, do laundry, flush the lavatory, or get well-water for drinking, because the first (1<sup>st</sup>) and original pump (**Exhibit-N**) had been vandalised and damaged before we arrived. So, we purchased a second (2<sup>nd</sup>) pump on 10-03-2018 for \$3,114.80 (**Exhibit-O**), just before our eviction (in preparation for moving in the new house), but it failed and was replaced. It was under warranty, but we had to pay \$375.00 in labour on 01-19-2019 (**Exhibit-P**), and we got a third (3<sup>rd</sup>) pump, which was NOT under warranty, since it was burnt up by a voltage problem: It pump failed, we discovered, because the electric ground was not sufficiently grounded, and TECO (Tampa Electric Company) was honest enough (**Exhibit-N**) to warranty the damaged pump, and paid for a fourth (4<sup>th</sup>) pump to be put in (**Exhibit-Q**), actually paying for both pumps they damaged. (But the inconvenience of being unable to take a shower, flush lavatory toilets, have drinking water, do laundry, etc., plus TIME LOST in these ventures, slowed me down, and impeded my attempts to file in This Court earlier.) Furthermore, my computer (the thing that lets**

me get online and type of a coherent motion or brief) was packed away, and, for months on end, unavailable, and covered beneath piles of a lifetime of belongings. And, even when I could finally get it unpacked, the Internet out here in the country (all we can currently afford) is even slower than dial-up speed. **(Exhibit-R)** Besides weeks (if not months) of lack of 'basic' things like lavatory toilet, shower, Internet, and computer, I'm still on food stamps, and barely able to keep up with the most basic bills (gas, food, car insurance, rent & utilities, etc.), both financially, and even more-so, from a time-management standpoint.

My filings in this court (and the appeals court above), in which I compete against “rich and powerful” attorneys—*whom this court had adamantly and repeatedly protected, after they took my friend's house, and didn't pay him a dime for it, taking hundreds of thousands in documented equity, as well*—takes huge amounts of my precious time (that I could, theoretically, spend working a job—if one were to be found in my area).

This “last” issue should be addressed before I make my conclusion: I apologize to This Court (and the appeals court, who will be reviewing this filing and any motion to extend deadlines), for my slowness, but it is all I can do to barely hold-even against the tide. (I will be lucky to file this in time for you to respond before my 02-28-2019 deadline expires, meaning, even if you respond today, you will still have to compile and transmit the record on appeal, necessitating another Order to Extend Time, no matter what occurs, here today.) That being said, I point out the Electric Company **(Exhibit-D)**, which paid for their damage: They didn't hesitate to pay for what they damaged, and I firmly believe that the judges of This Court are at least as honest and sincere. Indeed, I vividly recall Daniggelis telling me, on several occasions, that Judge Diane M. Shelley was careful to warn his attorney, Andjelko Galic, that she might not be in this division next year should he refile this case after her Order granting his “Non-Suit” aka “Voluntary Dismissal” motion, which clearly shows that she cared for him, as a person, and did not, merely, view Daniggelis & his attorney “as a number.” And, Justice Daniel J. Pierce, on the appellate court, could easily have denied any or all of my motions to extend time; And, whatever other egregious complaints I might have with his court or yours, I am firmly certain that he—like most judges and justices—are sincere and want to “do the right thing” as we saw the electric company do.

So, I am apologizing much for making mistakes or being slow on a few, recent occasions—when it was mostly out of my control. And, yet, This Court is NOT apologizing (or making good), at all, for denial of my fair day in court on many occasions, repeatedly. That contrast is a key difference in how different parties are carrying their end of the burden.

But, in spite of the court's obvious slackness in doing it's part, I know that 2 wrongs do not make a right, **and I am genuinely sorry for what little I have done to impede the wheels of justice.** That is why I go to lengths to make a personal, and detailed, apology.

**CONCLUSION**

Since this court never ruled on defendant's 7-7-2017 Motion to Intervene, procedural due process is implicated. In light of Judge Flanney's complaint (see **Exhibit-S**, his March 01, 2018 order) that this court never granted leave to intervene (participate, his words), it is therefore appropriate for this court to review on the merits—and rule on—the following three (3) legal questions:

- 1) 735 ILCS 5/2-408(a)(2) and 735 ILCS 5/2-408(a)(3) Intervention [my 7-7-2017 motion, **Exhibit-F**]
- 2) Rule 298 Application for Waiver of Court Fees [see my ELECTRONICALLY FILED, 1/22/2018 6:33 PM, 2007-CH-29738, **Exhibit-I**]
- 3) This Rule 321 motion to limit Contents of the Record on Appeal [the instant motion]

As Judge Michael F. Otto delineates in his December 07, 2015 Order in the Chancery case by the same case number, which underlies this case, this court considers motions on the merits, not its title or caption, citing *Vanderplow v. Krych*, 332 Ill. App. 3d. 51, 54 (1<sup>st</sup> Dist. 2002) (“the nature of a motion is determined by its substance rather than its caption... and a court should not blindly adhere to nomenclature at the expense of reality”) (citations and punctuation omitted). Since the elderly Daniggelis was made homeless, this is not unlike a 911 situation, and I remind the court and clerks: What if **\*\*you\*\*** called 911, and the the 911 dispatcher—instead of giving you needed service—rather, asked you to provide “boxes and boxes” (see Patricia O'Brien's email, above) of paperwork, which he knew you couldn't afford. While the court is not a police station, the analogy is comparable, because both acts (or lack) could put lives of elderly people in jeopardy. This case has dragged on, unnecessarily delayed years (if not decades) by a court-system which refuses to afford either **Procedural Due Process** or **Substantive Due Process**, to both elderly Rich Daniggelis, or appellant Watts.

The “proposed order” in this motion is “light-weight,” and not heavy at all: It simply requests a VERY SMALL quantity of material be compiled into a 'limited' Record on Appeal (not very costly to this court) and, I'm very aware of the financial strains under-which ILLINOIS has recently found itself, and am confident that this matter will not burden you much—and can probably be easily & quickly prepared in a few days or weeks. Therefore, defendant-appellant Watts asks this court to consider this “Rule 321 motion” on the merits of all three (3) legal questions above, and issue a ruling on all three legal questions: Movant asks this court, after having granted technical motions 1 and 2 above, to speedily order the Civil Appeals Division to prepare the limited record enumerated in the proposed order of the 4/20/2018 motion, and speedily transmit it to the IL First Appellate Court, in appellate file number 1-18-0091.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
2046 Pleasant Acre Drive, Plant City, FL 33566-7511  
PH: (863) 687-6141 [home] or (863) 688-9880 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: "Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath." Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: **Wednesday, 27 February 2018**

**/s/Gordon Wayne Watts  
Gordon Wayne Watts**



**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION**

GMAC Mortgage, LLC	)	Case No.: 2007 CH 29738
<b>Plaintiff,</b>	)	(Transfer to Law Division)
	)	<b>In re: 1-18-0091 (appellate file)</b>
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

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**ORDER**

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for the instant **Rule 321 motion to limit Contents of the Record on Appeal**, and, notice having been given, and the Court being fully advised in the premises. **IT IS HEREBY ORDERED that:**

**Application for fee wavier by Defendant, Gordon Wayne Watts, is hereby granted, and this court grants leave to intervene and participate in this case, but only for the purpose of preparation of a limited record on appeal, with the items enumerated below:**

- All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals

The Clerk of the Circuit Court of Cook County (via the Civil Appeals Division) shall prepare the following limited record of appeal, without cost, to appellant, Gordon Wayne Watts, and transmit it to the IL First Appellate Court, **in case number 1-18-0091.**

ENTERED: \_\_\_\_\_  
Judge Diane M. Shelley, #1925  
Date: \_\_\_\_\_

Prepared by:  
Gordon Wayne Watts  
2046 Pleasant Acre Drive  
Plant City, FL 33566-7511  
(863) 687-6141, (863) 688-9880

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC ) Case No.: 2007 CH 29738  
Plaintiff, ) (Transfer to Law Division)  
) **In re: 1-18-0091 (appellate file)**  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that today, **Wednesday 27 February 2019**, I am causing to be filed with the Clerk of the Court of Cook County, Illinois, my **Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
2046 Pleasant Acre Drive, Plant City, FL 33566-7511  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays Cc: [CivilAppeals@CookCountyCourt.com](mailto:CivilAppeals@CookCountyCourt.com)

\***Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602, Courtesy copy via: [Timothy.Evans@CookCountyIL.gov](mailto:Timothy.Evans@CookCountyIL.gov) [**served, as a courtesy, since he is not a party proper**]

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) [**served, as Judge Flannery is a defendant in the Mandamus proceedings**]

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) [**served, as Judge Shelley is a defendant in the Mandamus proceedings**] Cc: [Michael.Otto@CookCountyIL.gov](mailto:Michael.Otto@CookCountyIL.gov) as a courtesy since he made key rulings in the underlying Chancery case, by the same case number—two of which were directed to defendant, Watts

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

\* **Richard B. Daniggelis** (who receives mail, via USPS mail-forwarding at his old address) 1720 North Sedgwick St., Chicago, IL 60614-5722 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

\* **Andjelko Galic (Atty. for Richard B. Daniggelis)** (Atty#:33013) C:312-217-5433, Fx:312-986-1810, Ph:312-986-1510, [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ; [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) 845 Sherwood Road, LaGrange Park, IL 60526-1547

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net> 312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

**SERVICE LIST (continued)**

- \* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602
- \* **Paul L. Shelton**, *Pro Se*, (Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ;  
[PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351
- \* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291, last known emails (see **Exhibit-G**) are as follows: [ERRegi@mail2.tread.net](mailto:ERRegi@mail2.tread.net), [Erika.Rhone@SbcGlobal.net](mailto:Erika.Rhone@SbcGlobal.net),  
[Erhone@Mindspring.com](mailto:Erhone@Mindspring.com), [Erika@GrandKahn.com](mailto:Erika@GrandKahn.com), [ErikaRhone@sbcglobal.net](mailto:ErikaRhone@sbcglobal.net),  
[ER5526199@aol.com](mailto:ER5526199@aol.com) and per: [https://www.FastPeopleSearch.com/ms-erika-r-rhone\\_id\\_G-5317261083665188477](https://www.FastPeopleSearch.com/ms-erika-r-rhone_id_G-5317261083665188477)
- \* **Rosa M. Tumialán** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) (312) 876-1700, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300 Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]
- \* **Dawn Williams** ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)) ([DPeacock@KentLaw.iit.edu](mailto:DPeacock@KentLaw.iit.edu)) Note: Served to work address, as she has NOT been excused by Court as an attorney of record—but not served to personal email, as a courtesy, as she claims, via auto-responder email, to no longer work at DYKEMA. Phone: 616-776-7518, DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]
- \* **Atty. Justine A. Lewis, Esq.** ([JLewis@Dykema.com](mailto:JLewis@Dykema.com)), Senior Manager, Recruiting and Professional Development \*\* Note: Now included on service list per official email from Dykema – see **Exhibit-H**. Phone: 312-876-1700, FAX: 866-771-2154 or 312-876-1155, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300, Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX] Chicago office address per: <https://www.Dykema.com/www.dykema.com/careers-associates-opportunities.html>
- \* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[**Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.**]]

**SERVICE LIST (continued)**

\* **Associated Bank, N.A.**, 200 North Adams Street, Green Bay, WI 54301-5142  
Web: <https://www.AssociatedBank.com/about-us> PH: (920)433-3200, (800)236-8866, or (800)682-4989, Email address: [WeCare@associatedbank.com](mailto:WeCare@associatedbank.com) per: view-source:<https://www.AssociatedBank.com/contact> and: [ShareHolders@AssociatedBank.com](mailto:ShareHolders@AssociatedBank.com) per: <http://Investors.EquityApartments.com/drip.aspx?iid=100135> and [ColleagueCare@AssociatedBank.com](mailto:ColleagueCare@AssociatedBank.com) per: <https://AllHispanicJobs.com/s/find-associated-bank-jobs-in-usa>

\* **MERS (Mortgage Electronic Registration Systems, Inc.)** <https://www.MersInc.org/about-us/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and Corporate Secretary for MERSCORP Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**  
Removed from service list, and not served, as the court excused them as parties: **“As a result of the dismissal of Counts X and XI, Third party Stewart Title of Illinois n/k/a Stewart Title Company is no longer a party to this litigation.”** [See the 11/09/2012 ORDER for Voluntary Dismissal by Agreement in *GMAC v. Daniggelis*, 2007-CH-29738, the Chancery case underlying this case]

\* **Stewart Title, Attn: Leigh Curry**  
Removed from service list, and not served, as the court excused them as parties—see above.

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 **[[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court.]]**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC	)	
<b>Plaintiff,</b>	)	Case No.: 2007 CH 29738
	)	(Transfer to Law Division)
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

\* The undersigned **Defendant-Appellant, Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Rule 321 motion to limit Contents of the Record on Appeal, Index to exhibits, Proposed Order, NOTICE OF FILING, an updated/corrected SERVICE LIST, and this Certificate of Service, and attached EXHIBITS**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – **today, this Wednesday, 27 February 2019**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.

\* I am NOT serving any parties via **First Class U.S. Postal Mail** –*as I customarily do (due to financial constraints), as Rule 11 does not require hard-copy service if email is used.*

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings –**online at my official websites, infra** –linked at the “Mortgage Fraud” story, dated Fri. 14 April 2017—see e.g., the “Open Source Docket” link in said news item.[see **EXHIBIT-C**]

\* Lastly, I'm concurrently effecting service via **e-mail**.

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

***Respectfully submitted,***  
*/s/ Gordon Wayne Watts*  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
2046 Pleasant Acre Drive, Plant City, FL 33566-7511  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**INDEX TO THE EXHIBITS**

<b><u>Instrument</u></b>	<b><u>Docket/Tab#</u></b>
Thr 25 Oct 2018 ORDER (1-18-0091) Mot Ext Time: GRANTED	Exhibit-A
Federal Appeals Court Order allowing Defendant, Watts, <i>Amicus</i> status	Exhibit-B
Fri 20 Apr 2018 Motion Clarification (07CH29738: Law Div)	Exhibit-C
3-8-2013 ORDER by Hon. Michael F. Otto in this case	Exhibit-D
Medical Documentation of defendant, Watts, nearly dying (hardship)	Exhibit-E
Timely 7-7-2017 Motion for Intervention	Exhibit-F
Citations showing Defendant, Watts nearly won Schiavo case – all by himself, doing even better than former Florida Gov. John Ellis “Jeb” Bush before the same panel of FLORIDA SUPREME COURT Justices	Exhibit-G
Thr 03 May 2018 ORDER Lack Jurisdiction (1-18-0572)	Exhibit-H
Timely STAMPED Fri 19 Jan 2018 Fee Waiver App (07CH29738 Law Div)	Exhibit-I
Wed 17 Oct 2018 Mot Ext Time (01-18-0091)	Exhibit-J
Obituary & Death Certificate for Bobby Watts (Defendant's father; Hardship)	Exhibit-K
Fri 28 Sept 2018 ORDER Dismissed Lack Jurisdiction (1-18-0538)	Exhibit-L
Eviction Notice (Hardship)	Exhibit-M
TECO (Tampa Electric Company) complain cover letter	Exhibit-N
10-03-2018 receipt for second (2nd) pump put in for \$3,114.80	Exhibit-O
01-09-2019 receipt for third (3rd) pump put in for \$375.00, labour only	Exhibit-P
Quote for fourth (4th) well-water pump, for parts only, for \$1,620.85	Exhibit-Q
Documentation of defendant, Watts' Internet (dial-up speeds – Hardship)	Exhibit-R
3-1-2018 Order by Hon. James P. Flannery, wrongly denying Fee Waiver App	Exhibit-S

**Exhibit-A**

Order of the District Court of Appeal, First District, ILLINOIS, dated, OCT 25 2018 **Exhibit-A**, which directed that “Appellant must direct inquiries on the content of [the] record on appeal to [the] clerk of the circuit court of Cook County.”



IN THE APPELLATE COURT OF ILLINOIS  
FIRST JUDICIAL DISTRICT

GMAC MORTGAGE, LLC n/k/a: BANK OF AMERICA, )  
N.A., aka: "LASALLE BANK NATIONAL )  
ASSOCIATION", aka: "US BANK, NA, "as trustee for )  
MORGAN STANLEY LOAN TRUST 2006-16AX, )

Plaintiffs-Appellees, )

v. )

No. 1-18-0091 )

RICHARD B. DANIGGELIS, GORDON WAYNE )  
WATTS, JOSEPH YOUNES, MORTGAGE )  
ELECTRONIC REGISTRATION SYSTEMS (MERS), )  
PAUL L. SHELTON, ERIKA R. RHONE, STEWART )  
TITLE ILLINOIS, JOHN P. LAROCQUE, ROBERT J. )  
MORE, LEGATEES, NON-RECORD CLAIMANTS, )  
UNKNOWN HEIRS, UNKNOWN OWNERS, et al., )

Defendants-Appellants. )

**ORDER**

This matter coming to be heard on the motion of defendant-appellant Gordon Wayne Watts for extension of time to file the record on appeal, IT IS HEREBY ORDERED THAT:

The motion for extension of time is GRANTED, with the record to be filed on or before February 28, 2019. Any further request for extension must be supported by affidavit showing that Appellant complied with prior orders of this court, including the order of March 28, 2018, that "Appellant must direct inquires on the content of [the] record on appeal to [the] clerk of the circuit court of Cook County."

**ORDER ENTERED**

OCT 25 2018

APPELLATE COURT, FIRST DISTRICT

*Mary L. Mykwa*

Justice

*Samuel K. Quinn*

Justice

*[Signature]*

Justice

THOMAS D. PALELLA  
CLERK OF THE APPELLATE COURT 1ST DISTRICT  
160 NORTH LASALLE STREET, RM 91400  
CHICAGO, ILLINOIS 60601

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1-18-0091

GORDON WAYNE WATTS  
821 ALICE ROAD  
LAKELAND FL 33801

*Received vs. Proof -  
Monday, 29 October 2018, 11:  
- Ofelia Nazario (BSP)*



33801-211321

Court ruling & docketing information in the recent “Gay Marriage” case, heard before  
the U.S. 11<sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, Georgia Exhibit-B (1<sup>st</sup> of 3 pages)

[January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne  
Watts' (Pro Se) motion for leave to file an amended *Amicus Curiae* brief and denying Mr. Anthony Clare  
Citro's (Pro Se) motions for leave to file out of time and for leave to file as *Amicus Curiae*

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 2

IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

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No. 14-14061-AA

---

JAMES DOMER BRENNER, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

---

No. 14-14066-AA

---

SLOAN GRIMSLEY, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

---

Appeals from the United States District Court  
for the Northern District of Florida

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FILED DATE: 2/27/2019 7:28 PM 2007CH29738

ORDER:

Clare Anthony Citro's motions for leave to file out of time and for leave to file a brief as *amicus curiae* are DENIED.

Gordon Wayne Watts's motion for leave to file an amended *amicus curiae* brief is GRANTED.

  
UNITED STATES CIRCUIT JUDGE

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 1

**UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING  
56 Forsyth Street, N.W.  
Atlanta, Georgia 30303

John Ley  
Clerk of Court

For rules and forms visit  
[www.call.uscourts.gov](http://www.call.uscourts.gov)

January 06, 2015

Anthony Citro  
254 SW 7TH ST  
DANIA, FL 33004-3948

Gordon Wayne Watts  
821 ALICIA RD  
LAKELAND, FL 33801-2113

Appeal Number: 14-14061-AA ; 14-14066 -AA  
Case Style: James Brenner, et al v. John Armstrong, et al  
District Court Docket No: 4:14-cv-00107-RH-CAS

**This Court requires all counsel to file documents electronically using the Electronic Case Files ("ECF") system, unless exempted for good cause.**

The enclosed order has been ENTERED.

Sincerely,

JOHN LEY, Clerk of Court

Reply to: David L. Thomas, AA/rvg  
Phone #: (404) 335-6169

MOT-2 Notice of Court Action

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**Exhibit-C**

Timely Rule 321 Motion Electronically-filed on “4/20/2018 6:34 PM,” in this case **Exhibit-C**, in the CIRCUIT COURT OF COOK COUNTY, ILLINOIS LAW DIVISION, which Defendant-Appellant filed pursuant to the ORDER ENTERED MARCH 28, 2018, Appellate Court, First District.



## E-Notice

2007-CH-29738

CALENDAR: W

To: Gordon Wayne Watts  
gww1210@gmail.com

---

# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
GMAC MORTGAGE LLC v. YOUNES JOSEPH

The transmission was received on 04/20/2018 at 6:34 PM and was ACCEPTED with  
the Clerk of the Circuit Court of Cook County on 04/23/2018 at 8:55 AM.

**NOTICE OF REPORT OF RECORDS OF PROCEEDINGS (This is closest I can find to describe filing:  
I'm giving notice of report of proceedings in Appellate Court, which has issued order for my to  
direct inquiry to this court regarding Record on Appeal./)**

Filer's Email: gww1210@gmail.com  
Filer's Fax:  
Notice Date: 4/23/2018 8:55:26 AM  
Total Pages: 10

**DOROTHY BROWN**  
**CLERK OF THE CIRCUIT COURT**  
COOK COUNTY  
RICHARD J. DALEY CENTER, ROOM 1001  
CHICAGO, IL 60602

(312) 603-5031  
courtclerk@cookcountycourt.com

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC )  
Plaintiff, ) Case No.: 2007 CH 29738  
) (Transfer to Law Division)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

**Motion for Clarification concurrent with  
Rule 321 motion to limit Contents of the Record on Appeal**

In the exercise of the reviewing Court's appellate authority, the Appellate Court, First District, has entered an order, in *GMAC v. Watts*, 1-18-0091, that: "Appellant must direct inquiries on the content of the record on appeal to the Clerk of the Circuit Court of Cook County."

ORDER ENTERED MAR 28 2018, Appellate Court, First District.

Pursuant to the above-quoted/cited order (see *infra*: **Exhibit-A**), Appellant, Gordon Wayne Watts, now directs inquiry to This Court regarding the content of the record on appeal in 1-18-0091—**hereby moving for clarification** of whether or not the 7-7-2017 motion to Intervene stated sufficient grounds to intervene in the case at bar.

Moreover, in concurrent motion, Appellant, Watts, now moves this court to "order less" for the Record on Appeal, in accordance with Rule 321, notice, and proper hearing will having been given. [In support of this motion, Movant respectfully points out that a stipulation is highly unlikely given the fact that many parties can't even be located or have bad service addresses, and/or are unlikely to consent to anything, big or small, in this regard.]

Specifically, movant requests that the clerk prepare the limited record sought in the 3/16/2018 Motion for Extension of Time, in *GMAC v Watts*, 1-18-0091, a copy of which has been served upon this court in prior filings—and reproduced below, in the proposed order.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)



**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: **Friday, 20 April 2018**

/s/Gordon Wayne Watts  
**Gordon Wayne Watts**

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 2 of 10

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION**

GMAC Mortgage, LLC	)	
<b>Plaintiff,</b>	)	Case No.: 2007 CH 29738
	)	(Transfer to Law Division)
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

**ORDER**

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for Clarification and for preparation of a limited Record on Appeal, and, notice having been given, and the Court being fully advised in the premises:

**IT IS HEREBY ORDERED** that the Clerk of the Circuit Court of Cook County shall prepare the following record of appeal, without cost, to appellant, Gordon Wayne Watts, and transmit it to the IL First Appellate Court, in case number 1-18-0091—only the following lower court pleadings in the above-captioned case:

- All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals

ENTERED: \_\_\_\_\_  
Judge Diane M. Shelley, #1925  
Date: \_\_\_\_\_

Prepared by:  
Gordon Wayne Watts  
821 Alicia Road  
Lakeland, FL 33801-2113  
(863) 688-9880, (863) 409-2109

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 3 of 10

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC )  
Plaintiff, ) Case No.: 2007 CH 29738  
) (Transfer to Law Division)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that today, **Friday 20 April 2018**, I am causing to be filed with the Clerk of the Court of Cook County, Illinois, my **Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawyer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

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**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays, **[served by email only, as a courtesy, since they are not a party proper]**

\* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602, Courtesy copy via: [Timothy.Evans@CookCountyIL.gov](mailto:Timothy.Evans@CookCountyIL.gov) **[served by email only, as a courtesy, since he is not a party proper]**

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served in all ways, as Judge Flannery is a defendant]**

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) **[served in all ways, as Judge Shelley is a defendant]**

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

\* **Richard B. Daniggelis (who receives mail, via USPS mail-forwarding at his old address)** 1720 North Sedgwick St., Chicago, IL 60614-5722

\* **Andjelko Galic** Atty for Richard B. Daniggelis (Atty#:33013) C:312-217-5433, Fx:312-986-1810, Ph:312-986-1510, [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ; [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) 845 Sherwood Road, LaGrange Park, IL 60526-1547

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **MERS (Mortgage Electronic Registration Systems, Inc.)** <https://www.MersInc.org/about-us/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and Corporate Secretary for MERSCORP

**SERVICE LIST (continued)**

Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ;  
[SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with  
MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her  
as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ;  
[SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications  
Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ;  
[KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.)**,  
**1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252  
208 S LASALLE, Suite #1860, CHICAGO IL, 60604

\* **Stewart Title, Attn: Leigh Curry**

<http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html>  
2055 W. Army Trail Rd., STE 110, Addison, IL 60101 [ph:(630) 889-4050]

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-  
1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington  
Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the  
instant appeal, but the undersigned can not find any more recent atty of record for defendant,  
LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The  
Court.]]

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E:  
[RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Paul L. Shelton**, *Pro Se*, (Atty. #15323, disbarred per IARDC)

E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363,  
Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC )  
Plaintiff, ) Case No.: 2007 CH 29738  
) (Transfer to Law Division)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

\* The undersigned Defendant-Appellant, Gordon Wayne Watts, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – this **Friday, 20 April 2018**, via **“Cook County E-File”** if they're e-file registered.

\* I'm concurrently serving all parties via **First Class U.S. Postal Mail** and/or FedEx 3rd-party commercial carrier.

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings **–online at my official websites, infra** –linked at the “Mortgage Fraud” story, dated Fri. 14 April 2017.

\* Lastly, I may, later, cc all parties via **e-mail**, if I am able.

*Respectfully submitted,*

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

*/s/ Gordon Wayne Watts*  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawyer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

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**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* March 28, 2018 Order from the IL First appellate Court,  
directing Appellant to inquire in the instant motion

Exhibit-A

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NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, ) Appeal from the Circuit Court of Cook County, IL  
Plaintiff )  
vs. ) No. 07 CH 29737  
) (Transfer into Law Division from Chancery)  
Gordon W. Watts, et. al., )  
Defendants ) Hon. Diane M. Shelley, Judge Presiding

ORDER

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for an extension of time, and, notice having been given, and the Court being ~~un~~ advised in the premises:

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to June 12, 2018, and, pursuant to ~~Rule 311(b)~~ [Rule 311 Accelerated Docket, (b) Discretionary Acceleration of Other Appeals], ~~this appeal is placed on accelerated track. Pursuant to Rule 311(b), "The motion [to expedite] shall be supported by an affidavit stating reasons why the appeal should be expedited," and This Court notes that both the instant motion and prior pleadings by Appellant had either 'Verification' affirmations, or actual Sworn/Notarized affidavits, which compel The Court to accept at face value allegations that an accelerated appeal is necessary. [This court notes that Watts' claims on this head were never challenged as false.]~~

**IT IS FURTHERMORE ORDERED** that the trial court shall grant Movant's motion for Intervention, Grant his application for fee waiver, and prepare selected' items described below:

This court finds, per Rule 311(b), that it is warranted by the circumstances, and This Court now enters a ruling that the trial court prepare only the following supporting record prepared pursuant to Rule 328, consisting only the following lower court pleadings:

- All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals



**ORDER** - *GMAC v. Watts, et al.*, 1-18-0091 (ILLINOIS First Appellate Court)

The trial court shall prepare the Record on Appeal, with ONLY the items listed above (all the enumerated items, and ALL pleadings and related exhibits filed by Appellant, Gordon Wayne Watts), and shall place preparation of the selected records on "accelerated" track, and shall notify This Court when the record is prepared, and transmit it **instantly** to This Court.

After This Court makes the "selected" Record on Appeal, above, available to all litigants, it shall give ALL named parties ONE last opportunity, within thirty (30) days, to respond and to include anything relevant in the record (to make up for anything that was omitted for the sake of brevity), and to file ONE supporting brief, which complies with page and word-length requirements, citing to any supplemental record items.

Since the 'Record on Appeal' shall be less than 100% of the total record (due to time and space constraints), This Court deems it necessary, to satisfy Due Process, to give ALL parties opportunity to respond, and then This Court shall, if no counter arguments are raised, return Richard Daniggelis' house to him, with equitable damages awarded, by Summary Judgment. The "last chance" to file a brief, to grant fair Due Process to defendants, Joseph Younes, and other named defendants, shall be considered a chance to reply to a "Show Cause" order, This Court asking litigants to show cause why Daniggelis' house should not return to him.

Whether or not litigants file an 'answer' brief (this is optional), This Court **shall** review The Record (and any "one-time" briefs, submitted, as described above), **shall** consider the facts and law, and **shall render a decision**, in compliance with the 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))].

The trial court shall speedily prepare the selected record, notify this court, and transmit it to this court by electronic means, on accelerated docket.

*Appellant must direct inquiries on the content of record on appeal to Clerk of Circuit Court of Cook County.*  
~~IT IS SO ORDERED~~

Justice

*David J. Deuce*

Justice

Justice

**ORDER ENTERED**

MAR 28 2018

APPELLATE COURT, FIRST DISTRICT

Prepared by:  
Gordon Wayne Watts  
821 Alicia Road  
Lakeland, FL 33801-2113  
(863) 688-9880 (h), (863) 409-2109 (c)

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# Law DIVISION

## Litigant List

Printed on 04/23/2018

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### Plaintiffs

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GMAC MORTGAGE LLC			0000	
BANK AMERICA NA			0000	
CHICAGO VOLUNTEER LEGAL			0000	
LASALLE			0000	
US BANK NATIONAL ASSOCI			0000	

Total Plaintiffs: 5

### Defendants

Defendant Name	Defendant Address	State	Unit #	Service By
DANIGGELIS RICHARD			0000	
GORDON WAYNE WATTS			0000	
HLB MORTGAGE			0000	
INVEST ONE			0000	
LAROCQUE JOHN			0000	
LEGATEES			0000	
MOORE ROBERT			0000	

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MORTGAGE ELECTRONICS RE 0000

NON RECORD CLAIMANTS 0000

PHONE ERIKA 0000

SHELTON PAUL 0000

STEWART TITLE ILLINOISZ 0000

TRUST ONE MORTGAGE 0000

UNKNOWN HEIRS 0000

UNKNOWN OWNERS 0000

YOUNES JOSEPH 0000

Total Defendants: **16**

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## **Exhibit-D**

Judge Otto's 3-8-2013 order in this case[[\*\*]], which documentes and verifies the forgery to execute mortgage fraud theft of elderly Daniggelis' house, land, and equity, documeted to be hundreds of thousands of dollars:

[[\*\*]]Note: Otto admits (Order, p.4, top of page, **Exhibit-D**) that the July 9, 2006 warranty deed "is in most respects identical" to the May 9, 2006 warranty deed that Daniggelis signed (except, of course, for the word 'July' being hand-written in), which supports Daniggelis' claims that there was photocopy forgery of his signature, which forgery—all by itself—would void the entire illegal transfer of title.

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION  
MORTGAGE FORECLOSURE/MECHANICS LIEN SECTION**

<b>U. S. BANK, N.A., etc.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 07 CH 29738</b>
	)	
<b>vs</b>	)	<b>1720 N Sedgwick Ave.</b>
	)	<b>Chicago, IL</b>
<b>JOSEPH YOUNES, RICHARD DANIGGELIS,</b>	)	
<b>et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**ORDER**

**THIS MATTER** coming before the Court for ruling on the Motion of Plaintiff/Counter-Defendant U.S. Bank National Association (“Plaintiff” or the Bank) for Partial Summary Judgment as to Counts II and III of the Third Amended Complaint and Counts I, II, III and V of Richard Daniggelis’s Amended Counterclaim, and Counter-Plaintiff Daniggelis’s Motions to Strike the Affidavits of Rashad Blanchard and Howard Handville, the Court being fully advised in the premises including the oral arguments presented regarding this and other motions on February 15, 2013;

**THE COURT HEREBY ORDERS:**

The Bank’s Motion for Partial Summary Judgment is denied in part as moot, and granted in part, and Daniggelis’s Motions to Strike are denied as moot, for the reasons stated below.

**Background**

This case has been pending before this Court for approximately five and a half years. Voluminous pleadings have been filed, motion practice engaged in and discovery propounded. The relevant factual framework for purposes of the issues raised in the motions presently before the Court, however, can be stated succinctly. In short, Daniggelis claims to be the victim of mortgage rescue fraud. *See, e.g., LaSalle Bank v. Ferone*, 384 Ill. App. 3d 239 (2d Dist. 2008). He asserts that in 2006, Paul Shelton, Erika Rhone and Joseph Younes conspired to dupe him into signing over to Younes a deed to his home, under the guise of rescuing his home from a foreclosure suit then pending against Daniggelis. They then subsequently misused that deed, along with a power of attorney Daniggelis had executed to Rhone, to effectuate a sale to Younes without Daniggelis’s consent.

The Bank has now moved for partial summary judgment, arguing in essence that the Bank merely provided money to finance a facially valid transaction. As such, the Bank argues, it must be held blameless regardless of whether any such fraud in fact occurred.

The below facts are either uncontradicted or are taken from Daniggelis's December 3, 2009 Verified Third Amended Answer, Affirmative Defenses and Counterclaims, and the Exhibits thereto. For the purposes of this Motion, the Court assumes the truth of the well-pled facts contained therein. The Court makes no finding to that effect, however, as it is not necessary (nor would it be appropriate) to do so at the summary judgment stage.

Defendant Daniggelis has lived at the subject property since 1989. In 2004, he fell behind on his mortgage payments and his lender, Deutsche Bank, filed a foreclosure action against him in this Court. *See Deutsche Bank v. Daniggelis*, No. 04CH10851.

In May 2006, while the Deutsche Bank foreclosure action was still pending, Daniggelis signed a warranty deed transferring the property to Defendant Joseph Younes. Daniggelis has attached that deed as Exhibit G to the Counterclaim.

Also in May 2006, Daniggelis executed a "Limited Power of Attorney For Real Estate Transaction" (POA) in favor of Rhone. Daniggelis has attached the POA as Exhibit L to the Counterclaim.

Exhibit L consists of two pages. Daniggelis asserts that both pages are part of the POA. Page 1 is a typewritten document, captioned as noted above. It is signed by Daniggelis, and names Rhone as his

true and lawful Attorney-In-Fact to act in, manage and conduct all my affairs individually for that purpose in my name and on my behalf to do and execute any or all of the following acts, deeds, and other documents and things, to wit:

To execute any and all documents and perform any and all acts necessary to effectuate the sale of the property at:

THE EAST 66 FEET OF LOT 8 IN C. J. HULLS SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE'S SUBDIVISION OF SECTION 33, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

CKA: 1720 North Sedgwick Street Chicago Illinois 60614

PIN#: 14-33-324-044-0000

Other Acts (if any): \_\_\_\_\_

**HEREBY GIVING AND GRANTING** unto my said attorney full power and authority whatsoever requisite or proper to be done in or about the premises, as fully to all intents and purposes as I might or could lawfully do if personally present, and hereby certifying and confirming all that my said attorney shall do or cause to be done under and by virtue of these presents.

(Counterclaim Exh. L, p. 1.) Page 1 of Exhibit L provides that the POA would remain in effect until revoked in writing, and was in any event irrevocable until June 30, 2006. On its face, Page 1 of Exhibit L contains no restrictions other than as noted above. It does not refer to any additional pages or terms. It bears Daniggelis's signature at the bottom of the page.

Page 2 of Exhibit L is a document handwritten on lined paper. Daniggelis asserts that the page was signed by Rhone (CC ¶ 76), but the Exhibit does not bear any signature. It provides:

AS LONG AS I (RICHARD) DO NOT SIGN  
OR SELL WITH ANYONE ELSE  
AND PAUL RECEIVES HIS MO [sic]<sup>1</sup>  
BACK BY EITHER SELLING  
JOE YONES [sic] OR RICHARD PAY  
HIM BACK DIRECTLY I ERIKA WILL N  
USE THE POWER OF ATTORNEY F  
ANY REASON OTHER THAN TODA  
PAYMENT OF ANY LEGAL AND MORTGAGE ARREARAGE

(Counterclaim Exh. L, p. 2.)

Subsequently, on July 28, 2006, there was a closing at Stewart Title. Daniggelis did not attend the closing. Where Daniggelis's signature was required on the closing documents, they were signed "Richard Daniggelis, attorney in fact, Erika Rhone." The settlement statement from the closing lists Daniggelis as selling of the property to Younes, for a purchase price of \$833,000.

To finance the property, Younes entered into the loan at issue in the present matter, in the amount of \$583,100, in addition to funds from at least two separate sources. The settlement statement indicated that among the disbursements was a payoff in full of the Daniggelis mortgage with Deutsche Bank, in the amount of \$634,604.55.

Daniggelis attaches as Exhibit DD to his Counterclaim a copy of the warranty deed from Daniggelis to Younes which was recorded with the Cook County Recorder of Deeds on August

---

<sup>1</sup> The Court has reproduced the text of the Court's copy of the document verbatim including where lines end. Due perhaps to imperfect reproduction, it appears that the rightmost edge of page 2 of Exhibit L may have been cut off, resulting in some letters being omitted.

16, 2006. The document is in most respects identical to the warranty deed Daniggelis claims to have signed in May. The date, however, differs. Exhibit G to the Counterclaim states that it was signed "on this 9th day of May, 2006." The entire clause is typewritten. The recorded version of the deed, however, states that it was signed "on this 9th day of July, 2006." The word "July" is handwritten in the document. No initials appear next to it. (Exh. DD.) The notary stamp also contains a handwritten "July."

In August 2006, Rhone came to Daniggelis's home, informed him about the July 2006 closing, and tendered him copies of the closing documents, which he refused to accept. In April 2007, Daniggelis filed a Notice of Forgery with the Recorder of Deeds, stating that the deed filed in August 2006 was a forgery.

Daniggelis contends that the deed he signed in May 2006 was intended to take effect only if the property was sold on or before May 31, 2006. He claims that the July 2006 closing took place without his awareness or consent.

**Pleadings**

**Complaint.** In 2007, LaSalle Bank filed the instant foreclosure action. The Bank's third amended complaint, filed October 7 2011, is in three Counts. Count I of the Complaint is a mortgage foreclosure action, asserting that mortgagor Younes has defaulted on the July 2006 loan. Count II of the Bank's Complaint seeks equitable subrogation to the Deutsche Bank loan which was paid off at the July 2006 closing. Count III of the Complaint seeks to recover principal and interest on the July 2006 loan based on the theory of unjust enrichment.

**Counterclaim.** Daniggelis answered the Complaint and brought an 11-count Counterclaim. The several counts of the Counterclaim seek relief against many counter-defendants, including the Bank, Younes, Rhone, Shelton, Stewart Title, and others. Multiple legal theories are raised. Only four counts of the Counterclaim are at issue for purposes of the present motion, however. Those are:

**Count I: Quiet Title: Invalid Deed**

Here Daniggelis seeks to quiet title in himself because the Bank (and others) "knew or should have known that the deed had been altered on its face and was no longer valid when the closing occurred."

**Count II: Quiet Title: Invalid Power of Attorney**

Here Daniggelis seeks to quiet title in himself because the Bank (and others) "knew or should have known that Daniggelis did not consent to the closing" because the POA "specified that it was only to be used to pay the arrearages on the Home and not for any other purpose."

**Count III: Rescission Based on Unjust Enrichment**



Here Danigellis seeks to rescind the transaction as against the Bank because the Bank was “unjustly enriched to the extent it received fees from the subject transaction and/or a security interest in Daniggelis’s property and the right to collect interest on the new mortgage executed by Younes.”

**Count V: Quiet Title: Based on Erika Rhone and Paul Shelton’s Fraud Against LaSalle Bank, N.A.**

Here Danigellis seeks to quiet title in himself because Rhone and Shelton “fraudulently used the Power of Attorney and Warranty Deed to effectuate the sale of the Home to Younes” and the Bank (and others) “knew or should have known that Rhone used the Power of Attorney fraudulently to effectuate the sale to Younes.”

**Motion Practice**

The Bank has now moved for Summary Judgment on Counts II and III of its Complaint and Counts I, II, III and V of the Daniggelis Counterclaim.

Daniggelis filed no response to the Bank’s Motion, but instead only moved to strike the affidavits of Rashad Blanchard and Howard Handville, which were among the exhibits to the Bank’s Motion. The Bank filed a combined Response to Daniggelis’s Motions to Strike.

Concurrently with Bank’s Motion for Summary Judgment and Daniggelis’s Motions to Strike, numerous other motions were brought.

- The Bank brought a separate motion for summary judgment on Count I of the Complaint (foreclosure) against Younes, Mortgage Electronic Registration Systems, Inc. (“MERS”), and unknown owners and non-record claimants – this motion was not directed against Daniggelis.
- The Bank also moved to find MERS in default.
- Daniggelis moved for summary judgment against the Bank on Counts I, II and III of the Complaint.
- Younes moved for Summary Judgment against Daniggelis, contending that Younes was a bona fide purchaser for value. This motion does not on its face state explicitly the counts of the pleadings towards which it is directed, but does reference Daniggelis’s three quiet title counts against Younes (Counts I, II and V of the counterclaim).

The Court disposed of all motions other than the pending Motion for Summary Judgment and Motions to Strike as provided in its Order of February 15, for the reasons stated on the record at the hearing.

## ANALYSIS

### I. Counts II and III of the Third Amended Complaint

The Court denies the Bank's Motion as to Counts II and III of the Third Amended Complaint on the grounds of mootness. At the February 15 hearing, after the Court had disposed of the other motions noted above, the Court inquired of the Bank whether there remained a need to decide the instant motion for summary judgment given the Court's disposition of the other motions – specifically, the Court having granted Younes's Motion for Summary Judgment against Daniggelis and the Bank's Motion for Summary Judgment on Count I of the Complaint. The Bank acknowledged that the instant motion was moot as it pertains to Counts II and III of the Complaint, because those Counts sought relief if the Court found Daniggelis's rights superior to Younes (or declined to rule). Because the Court has granted the Bank a judgment of foreclosure against Younes based on the default on the July 2006 mortgage, and has found Younes to be a bona fide purchaser from Daniggelis, there is no need to resolve Counts II and III of the Complaint.

### II. Counts I, II, III and V of the Counterclaim

The Court grants the Bank's Motion for Summary Judgment on Counts I, II, III and V of the Counterclaim. On these matters, the Bank's Motion is a *Celotex*-type motion for summary judgment. See *Celotex Corp. v. Catrett*, 477 U.S. 317, 323, 91 L. Ed. 2d 265, 273, 106 S. Ct. 2548, 2552 (1986). As the Appellate Court has explained:

A defendant who moves for summary judgment may meet its initial burden of production in at least two ways: (1) by affirmatively disproving the plaintiff's case by introducing evidence that, if uncontroverted, would entitle the movant to judgment as a matter of law (traditional test), or (2) by establishing that the nonmovant lacks sufficient evidence to prove an essential element of the cause of action (*Celotex* test).

*Williams v. Covenant Med. Ctr.*, 316 Ill. App. 3d 682, 688-689 (4th Dist. 2000) (citations omitted). Here, the Bank, as Counter-Defendant, argues that Daniggelis lacks evidence to support his counterclaims against the Bank.

In opposing a *Celotex*-type motion, the non-movant may rely on his pleadings. See *Id.*<sup>2</sup> Thus, the Court assumes for purposes of analysis the truth of the well-pled facts contained in Daniggelis's Counterclaim and the Exhibits thereto.

---

<sup>2</sup> By contrast, "a party may not rely upon his or her own verified pleadings to oppose a motion for summary judgment when the movant has" filed a *traditional* motion for summary judgment, and has "supplied evidentiary material, such as an affidavit, that, if uncontradicted, would entitle him or her to judgment as a matter of law." *Gassner v. Raynor Mfg. Co.*, 409 Ill. App. 3d 995, 1005 (2d Dist. 2011).

**Count I: Quiet Title: Invalid Deed**

The Bank's motion is granted as to Count I. Daniggelis does plead that the warranty deed from himself to Younes "had been altered on its face" and provides evidence in support of that allegation – specifically, Exhibits G and DD to the Counterclaim, the Deed he signed in May 2006 and the Deed recorded with Cook County, with the latter identical but for the July handwritten the signature date.

The difficulty for Daniggelis is that he provides no factual or legal support for his assertion that, assuming the signature date to have been altered, the Bank therefore "knew or should have known that the deed ... was no longer valid when the closing occurred." It is true that any *material* alteration of a written instrument after signature will render the instrument void. *See, e.g., Ruwaldt v. McBride, Inc.*, 388 Ill. 285, 293 (1944). But this rule defines a "material" change as one which "so changes [the instrument's] terms as to give it a different legal effect from what it originally had, and thus work some change in the rights, obligation, interests or relations of the parties." *Id.* By contrast, a change which "could have no effect whatever upon the [instrument] or upon the rights, obligations, interests or relations of the plaintiff and defendant as the parties thereto ... could not be an alteration changing the legal effect of the instrument." *Cities Service Oil Co. v. Viering*, 404 Ill. 538, 547 (1949). Instruments remain fully enforceable notwithstanding an immaterial change. *Id.* Indeed, in *Viering*, the Illinois Supreme Court upheld a decree of specific performance of a land contract notwithstanding the deletion of a signator's name, on the grounds that the signator was not necessary.

In the instant matter, Daniggelis has offered no factual or legal support why the alteration of the signature date would have had any effect on the validity of the document, why the Bank should have believed the modification to have any legal effect on its enforceability, or for that matter why the Bank should have believed the modification to have been made after signature, as opposed to at the time Daniggelis signed the deed. Thus, even assuming the signature date to have been changed after Daniggelis signed it, the Bank is entitled to summary judgment.

**Count II: Quiet Title: Invalid Power of Attorney**

The Bank is entitled to summary judgment on Count II of the Counterclaim for similar reasons. Daniggelis again has shown no evidence why the Bank "knew or should have known" that the POA "specified that it was only to be used to pay the arrearages on the Home and not for any other purpose." The first page of the POA is facially a complete document. Daniggelis has presented no evidence that the Bank was ever made aware of what he represents to be the second (handwritten) page of the POA, nor why the Bank should have been aware of that page.

**Count III: Rescission Based on Unjust Enrichment**

The Bank is also entitled to Summary Judgment on Count III, Daniggelis's claim for rescission based on unjust enrichment. Daniggelis has shown no legal or factual basis for his contention that the Bank was "unjustly enriched" by having "received fees from the subject

transaction and/or a security interest in Daniggelis's property and the right to collect interest on the new mortgage executed by Younes." These matters – fees for extending a loan, a security interest and the right subsequently to collect interest on the loan – are ordinary, if not indeed essential, attributes of a mortgage transaction. Daniggelis has not given any explanation of how they constitute unjust enrichment in the instant case.

**Count V: Quiet Title: Based on Erika Rhone and Paul Shelton's Fraud Against LaSalle Bank, N.A.**

Finally, the Bank is clearly entitled to summary judgment on Count V of the counterclaim, which seeks to quiet title based on Rhone and Shelton's fraud *against the Bank*. Although Daniggelis asserts that the Bank should have known that Rhone was using the POA fraudulently, he provides no support for that conclusion here, just as he provided none in Count II of the Counterclaim, of which (at least as applied to the Bank) Count V appears to be nothing more than a restatement.

**III. Daniggelis Motions to Strike**

The Court denies as moot Daniggelis's Motions to Strike Affidavits. As noted above, the Bank's Motion for Summary Judgment on the Counterclaim is a *Celotex*-type Motion, in which the Bank argues it is entitled to judgment because Daniggelis "lacks sufficient evidence to prove an essential element of the cause of action." *Williams*, 316 Ill. App. 3d at 688-689. The Court has found the Bank entitled to judgment on that basis. Accordingly, the Court did not consider the evidentiary material the Bank submitted in support of its Motion as regards Counts II and III of the Complaint. The Motions to Strike are thus moot.

Accordingly, IT IS HEREBY ORDERED:

Plaintiff's Motion for Summary Judgment is DENIED IN PART AS MOOT, as regards Counts II and III of the Complaint. The Motion is GRANTED as regards Counts I, II, III and V of the Counterclaim.

Counter-Plaintiff's Motions to Strike are DENIED AS MOOT.

ENTER:



Michael F. Otto # Michael F. Otto

Judge

MAR 08 2013

Circuit Court - 2065

This order was sent to the following on the above stamped date:

Mr. Andjelko Galic, Esq. 134 N. LaSalle Street, Suite 1810 Chicago, IL 60602	Mr. Peter King, Esq. King Holloway LLC 101 North Wacker Drive, Suite 2010 Chicago, IL 60606
Mr. Richard Indyke, Esq. 221 N. LaSalle Street, Suite 1200 Chicago, IL 60601	

Counsel for Plaintiff will send copies of this order to all counsel of record not listed.

**EXHIBIT -- "E" (part 1 of 3)****MEDICAL RECORDS**

**Documentation of Appellant's medical emergency, which resulted in him nearly bleeding to death -- and with a blood Hemoglobin Level of '4' -- as compared with 'normal' levels of at least 13.5 (men) or 12 (women)**

Menu

RelayHealth - Health Records

app.relayhealth.com/PatientPortal/HealthRecords#!/HealthRecords/View/Results/1270788739

GordonWayneWatts (Yo) Microsoft.com/en-us/wc gww1210g gww1210f gww0dani gw00dani

[← Back to Your Results](#)

**Lakeland Regional Medical Center**  
1324 Lakeland Hills Blvd,  
Lakeland, FL 33805  
Phone: (863) 687-1100

**Patient Information**

**Order Details**

**History and Physical**

Lakeland Regional Health System

Patient: WATTS, GORDON WAYNE MRN: 000000578309 FIN: 040202961  
Age: 52 years Sex: Male DOB: 05/16/66  
Associated Diagnoses: None  
Author: LUND MD, KARA S

**Basic Information**  
Present at bedside: Medical personnel.  
Source of history: Self, Medical record.  
Referral source: Emergency department.  
History limitation: None.  
Advance directive: Full code.

**History of Present Illness**  
Mr. Gordon Watts is a 52 y.o. male with no past medical history who presented to the ED feeling short of breath and weak for several days. He also noted black and red colored stools for the past few days. He describes a recent episode of food poisoning for which he was taking Advil, ASA, Aleve and peptobismal for the abdominal pain associated with this. In teh ED, his hgb was found to be 4. He was also found to have AF with RVR. He has no known history of this. He was given a bolus of Cardizem with some improvement in his HR. He was given one unit of emergency PRBCs and 3 units of typed and crossed PRBCs. Hgb recheck was 8.4 after transfusion. Upon arrival to the ICU, he is in SR with HR in the 90s and hemodynamically stable.

**Review of Systems**  
Constitutional: Chills, Weakness.  
Eye: No recent visual problem.  
Ear/Nose/Mouth/Throat: No decreased hearing.  
Respiratory: Cough, No shortness of breath.  
Cardiovascular: No chest pain.  
Gastrointestinal: Abdominal pain: Right, The severity is moderate.  
Genitourinary: No dysuria, No hematuria.  
Endo: Cold intolerance.  
Musculoskeletal: No joint pain, No muscle pain.  
Integumentary: No skin lesion.

**EXHIBIT -- "E" (part 2 of 3)**

# Lakeland Regional Health®

Lakeland Regional Medical Center, Inc.  
1324 Lakeland Hills Blvd  
Lakeland, FL 33805  
863.687.1100

## MEDICAL RECORDS

**(Documentation of Appellant  
nearly bleeding to death from  
adverse reaction to over-the-counter meds)**

### PATIENT INSTRUCTIONS FOR AFTERCARE

**Name:** WATTS, GORDON WAYNE

**Current Date:** 06/08/18 11:20:14 Eastern Time

**DOB:** 5/16/1966 12:00 AM

**Arrival Time:** 6/05/2018 5:00 PM

**Diagnoses:**

Acute upper GI bleed; Atrial fibrillation with rapid ventricular response; Melena

**Attending Physician:** CAJUSTE MD, RENE

**Consulting Physician:** LUND MD, KARA S; EPPERSON CRNA, JESSICA L

**Primary Care Provider:** JEAN-PIERRE MD, ELMISE

**Phone:** (863) 687-1300

Thank you for allowing us to care for you. Understanding how to continue your recovery is essential to help maintain good health. This document contains important information for you after you leave us. Please review these instructions carefully and bring them to any follow-up appointments.

#### **Nondiscrimination Notice**

Lakeland Regional Health (LRH) complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. Lakeland Regional Health does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

If you feel LRH has discriminated in any way, you may file a grievance by calling 863.687.1025.

**Spanish:** ATENCIÓN: si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al 863.687.1025.

**French Creole:** ATANSYON: Si w pale Kreyòl Ayisyen, gen sèvis èd pou lang ki disponib gratis pou ou. Rele 863.687.1025.

#### **Access Your Secure Health Records Online**

Person Full Name WATTS, GORDON  
WAYNE  
06/8/2018 11:20:16

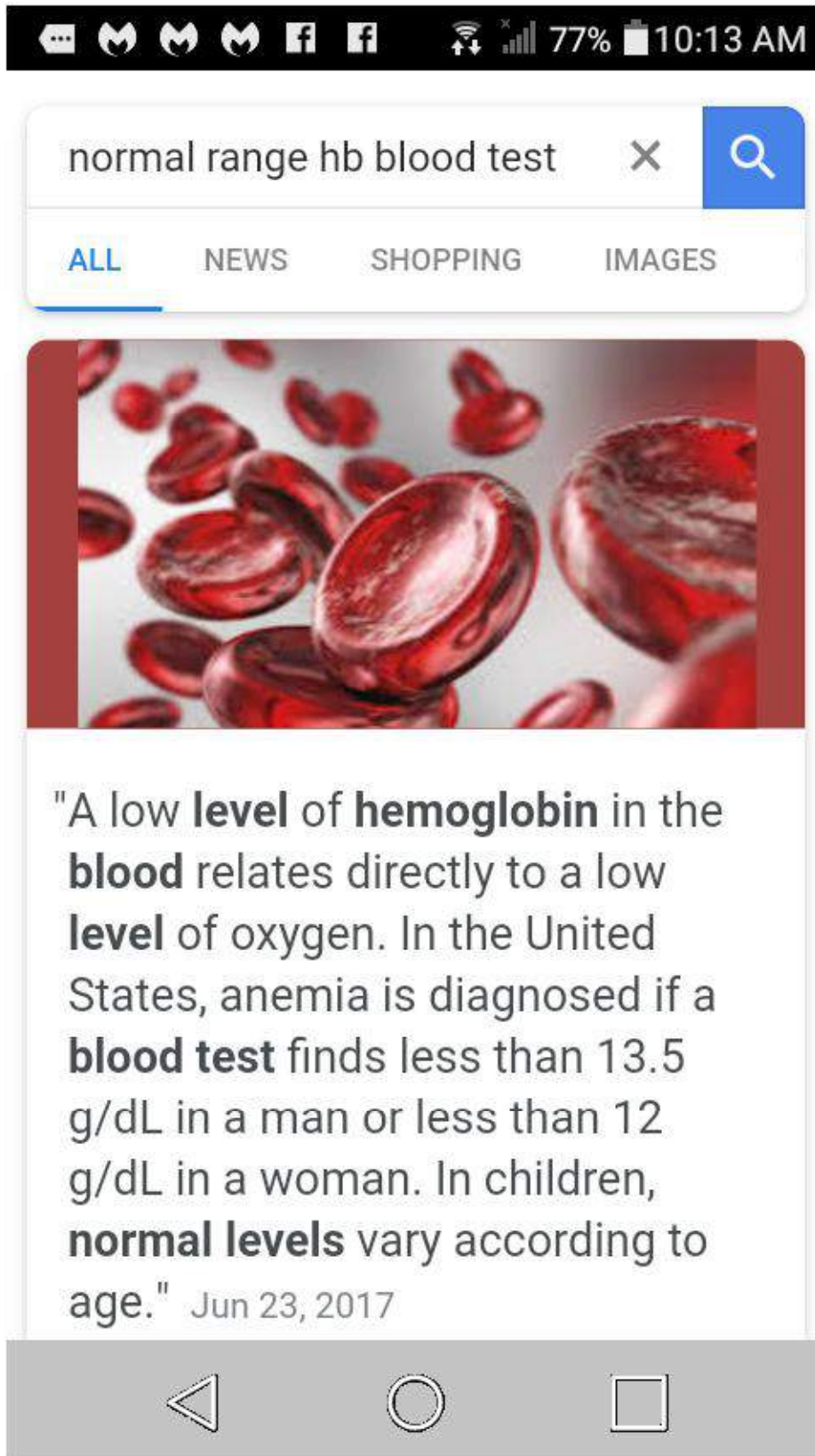
Gender Male

Date of Birth 05/16/66

**MEDICAL DOCUMENTATION:  
'Normal' levels of Blood Hemoglobin**

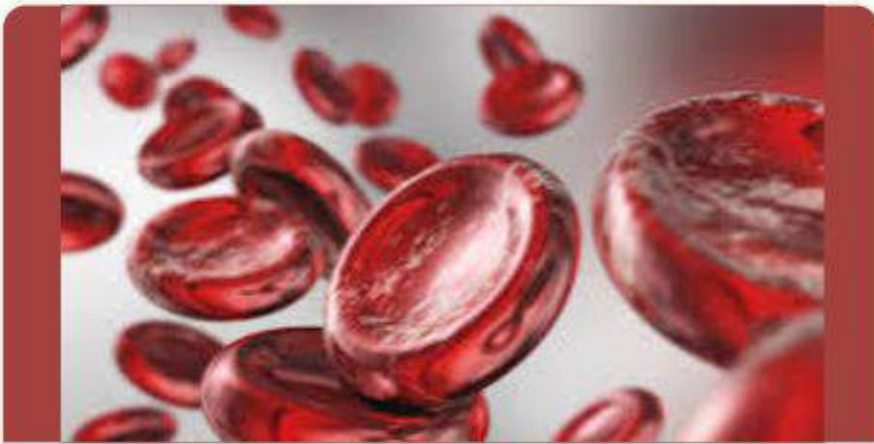
**EXHIBIT -- "E" (part 3 of 3)**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



normal range hb blood test X 🔍

ALL NEWS SHOPPING IMAGES



"A low **level** of **hemoglobin** in the **blood** relates directly to a low **level** of oxygen. In the United States, anemia is diagnosed if a **blood test** finds less than 13.5 g/dL in a man or less than 12 g/dL in a woman. In children, **normal levels** vary according to age." Jun 23, 2017



## **Exhibit-F**

**The timely-filed motion to Intervene dated  
7-7-2017 **Exhibit-F**, and on file with this court.**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

#99500

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
Plaintiff,

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,  
Defendants, and

Gordon Wayne Watts,  
Proposed Intervening Defendant.

Case No.: 2007 CH 29738

Before: Hon. DIANE M. SHEPHERD, Circuit Judge

Case Type: CONTRACT

District: First Municipal

Calendar "W", Courtroom 1912

TIME-SENSITIVE: to be heard

in Court Room: 1912, by 07/10/2017

Court Time: 10:30am (CST)

FILED  
JUL 11 2017  
MIDWEST  
CIRCUIT COURT OF COOK COUNTY

3303  
3004  
2800  
3320

Notice of Motion

To: This Honourable Court and all parties being served (see attached service list, below)  
From: Mr. Gordon Wayne Watts, LAKELAND, Fla. (full contact data, below)

Notice Proper: Pursuant to Local Rule 2.1 ["Notice of Hearing of Motions"], the undersigned movant is hereby giving this honourable court and all parties proper notice of the attached "MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS," being filed instanter, in the above-captioned case—a copy of which is attached hereto and is being served upon you.

Due to unfamiliarity with this very uncommon "local rule," movant did not give proper "notice" of past motions, via the "notice of motion," in accordance with said local rule, which is peculiar to this court alone. As This Court can see, the attached Motion to Intervene gives overwhelming evidence of Movant's right to claim legal standing to intervene – and that the interests not being represented are \*\*not\*\* "de minimus," (unless the court and parties are willing/able to reimburse to Mr. Watts the full amount documented herewith, and then some for unrecorded costs, time lost from work, and emotional losses).

Moreover: The undersigned Intervenor, Gordon Wayne Watts, through human fault, committed three (3) *unintentional* offenses against This Court (and all parties), and, by virtue of this pleading, is offering a sincere apology:

(1) While the undersigned litigant has generally had excellent and professional relations with the many clerks and lawyers involved (in Chancery, Civil, and Law Divisions, as well as numerous judges' chambers and the chambers of the Chief Judge, as well as the Office of the State Attorney, and the IL Attorney General), on rare occasion he has expressed human emotion to certain unnamed clerk(s), expressing profound disappointment over the rulings in the various cases regarding defendant, Daniggelis. While this is inexcusable and indefensible, Intervenor, Watts, views Daniggelis as sort-of a grandfather-figure (whom he feels was cheated out of a house, property, and hundreds of thousands of dollars of equity therewith), and, all of us being human can understand that if you kick a dog repeatedly (Mr. Watts is comparing himself to a dog), the dog will eventually yelp or holler. This does not justify the yelping bark, but it is offered up as "mitigating circumstances." Therefore, Mr. Watts offers his sincere apologies for occasional lapses in professionalism.

(2) Although Mr. Watts' legal standing to Intervene is very strong (see above—and the attached motion to intervene), he felt an "amicus" brief would be less invasive and more acceptable. While this may be the view of most courts, nonetheless, for reasons unknown, case law suggests that Cook County, IL courts take a much dimmer view of *amicus curiae* briefs than they do of, say, Intervention actions. Therefore, Mr. Watts offers his sincere apologies for taking an unintentionally-offensive legal tact, and is hereby changing course to a more accepted and conventional course: that of direct intervention, as provided by statutory and case law.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

(3) As mentioned in the instant "Notice of Motion," Intervenor, Watts, was unfamiliar with this uncommon rule (Local Rule 2.1, requiring a "notice of motion" to accompany motions) which appears unique to Cook County, IL courts—and therefore didn't comply with the rules of the court. **Therefore, pursuant to R.2.1, proper notice is being given of the above-mentioned motion—and an apology herewith is tendered to the court and parties.**

**Details:** Normally, a notice of motion contains a promise for the movant to appear as such-and-such time in such-and-such courtroom to present the motion: "Please take notice that on (certain date) and at (certain time), I shall appear before (named judge) – or any other judge, as may be holding court, in his/her absence – in (certain courtroom) to present (certain motion), which is attached hereto."

The undersigned Movant understands the value and importance of *in propia persona* physical appearance (to be available, for example, to answer any questions in real time, as well as connect name & face). However, physical appearance (as is normally done) is **mathematically impossible**, and yet **Due Process** requires that This Court consider the matter on the merits, so notice is given – *with arguments for an alternative*.

**Problem:** Movant lives in a far, distant locale called "Lakeland, Florida" (which is squarely between Tampa and Orlando, Fla.), and has neither a local attorney retained (to appear on his behalf), nor resources to glibly travel at the drop-of-a-hat whim to Chicago, Illinois (to appear for himself), due to oppressive and ever-present financial constraints.

**Proposed Solution:** This motion should be considered on its merits via written submission to This Court. *In the alternative*, This Court may also (if it so chooses) invoke Art. II, Rule 135 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, and/or Rule 206(h)(Remote Electronic Means Depositions), etc., by calling movant at either of his two phone numbers of record: 863-688-9880 (home) and/or 863-409-2109 (cell)

**Arguments Whereof:** It is **very common legal precedent** for motions to be considered in written form only. (In fact, this is probably the most common form, or at least a close second, if not first-place.) *Here are but a few examples:*

(1) Intervenor, Gordon Wayne Watts, filed direct intervention as "next friend" in the Florida Supreme Court on behalf of the late Theresa Marie "Terri" Schindler-Schiavo (see e.g., Exhibit-A). While the court eventually ruled against him in a razor-thin 4-3 split decision (garnering almost 43% of his panel), Mr. Watts' motions, nonetheless, were considered on the merits before the full Supreme Court of his home state, in this high-profile case, and, in fact, his intervention got even farther than that of former Florida Governor, John Ellis "Jeb" Bush, who filed similar intervention on behalf of Ms. Schiavo (Bush lost 7-0), or even Schiavo's blood family (who got only about 33% of their panel in Federal Court).

Watts lost 4-3 on rehearing. Bush lost 7-0 on rehearing – before the same panel, and on the same issue. (Apparently, the court liked Watts' "food/water" arguments better than the similar, but inferior "feeding tube" arguments presented by both Gov. Jeb Bush and Schiavo's parents.) Although Watts occasionally visited The Florida Supreme Court in person while he was a student at The Florida State University (in Tallahassee, Fla.), he never appeared in person to present his motions for intervention in the infamous "Terri Schiavo" case, and yet **The Court still considered the matter on the merits.** (See Exhibit-A)

(2) Subsequently, Mr. Watts decided to file an *Amicus Curiae* (a friend of the court brief) in one of the recent "Gay Marriage" cases pending before the Federal Appeals court in his circuit. In fact, he even went as far as to ask The Court for leave to amend 'out of time' (a rare procedure to allow a litigant to amend a brief, even though filing deadlines have passed, to correct errors and/or to add additional materiel, facts, arguments, etc.). It is believed that Watts was the only non-Lawyer litigant allowed participation in this case. (In fact, Watts was

permitted to amend his initial brief, out of time, even though another *pro se* non-Lawyer was denied: Ex-B) In any event, although Mr. Watts did not present, “in person,” his motion for leave to file an *amicus* brief, nor the *amicus* brief itself, by traveling to The U.S. 11<sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, GA, nonetheless, the court considered his brief and all related motions on the merits. (See, e.g., Exhibit-B)

**(3) Let us also consider the case of an imprisoned Illinois prisoner – in some state or county jail: many a “jailhouse lawyer” exists in our correctional institution's incarcerated population. They file all kinds of frivolous lawsuits, motions, and torts! While most of them end up in “file-13” of that great wastebasket of the Judicial System, nonetheless, state and federal Due Process requires these motions be considered on the merits. While the undersigned litigant has no “expert” knowledge of The State of Illinois court system, it goes without saying that not all prisoners are carted “back and forth” to the court for numerous frivolous motions (for very obvious cost-restraint reasons—in fact, Illinois is currently facing a financial crisis!). These prisoners, many of whom do not appear in person to present their motions, nonetheless, get “their day in court”: They don't appear in person, and yet their motions are still considered on the merits!**

**(4) Perhaps, the best argument for consideration of a motion, where the litigant can't travel to The Court in person to present it, comes from This Court itself! (And would, thus, be legally-binding case-law precedent.)**

Looking at *GMAC MORTGAGE LLC, et al. v. RICHARD DANIGGELIS, et al.* (case number: 2007-CH-29738), which was heard before the Chancery Division of the Cook County, IL circuit court (not to be confused with a case heard in the Law Division, and by the same style and case number, which was subsequently transferred from Chancery to Law), we see a spirited fight put up for justice in this case, by no less than Mr. Watts, himself: As but one example of a motion considered without litigant appearing in person, we find from the docket in the above-mentioned case, on 11/30/2015, Watts moved for rehearing (*without* appearing in person), and on 12/07/2015, The Court (Hon. Michael F. Otto, associate judge, presiding in this case) ruled, in courtroom 2804, in a ruling titled: “MISCELLANEOUS MOTION – ALLOWED.” While Judge Otto commits a tort of slander on page 3 of his Dec. 07, 2015 ruling<sup>1</sup>, nonetheless, he does rule on the merits of Watts request to Supplement the Record on Appeal (in the appeal that was pending at that time).

Although the undersigned movant would argue that rulings made by Hon. Judge Michael F. Otto (Associate Judge, #2605) were exceptionally incorrect (as a matter of case law, statutory law, and State & Federal constitutional rights), as applied to the facts of that case, nonetheless, Judge Otto finally (after much prodding and begging) considered the motions on the merits—and issued a ruling (right or wrong), not just once, but several times. (Judge Otto should be commended for an “A+” performance of granting “Procedural Due Process,” even if “Substantive Due Process” was trampled upon by what movant argues were “unjust” rulings.)

Therefore, even This Court's own legally-binding precedent confirms that State and Federal Due Process require all redresses, grievances, suits at law, and related motions to be heard on the merits—whether *or not* litigants seeking redress can physically travel to The Court *in propria persona*: ***The Court does not discriminate nor deny due process to litigants simply for being “too poor” to afford to hire a lawyer to appear—or to travel to appear themselves. Discrimination is wrong—in any of its forms or manifestations.***

<sup>1</sup> *Falsely claiming that Watts is arguing that vexatious litigants practices are 'OK'—direct quote: “The argument that all strangers to a case should be allowed to engage in the tactics of a vexatious litigant is so unpersuasive as to require no further discussion.”—Watts **\*\*never\*\*** said such things within the “4 Corners” of any of his briefs, arguing only that if vexatious litigants be given a fair hearing, then he should be heard & treated fairly too. Thus judge's statement/claims was false, and slanderous, but we're all human, and make mistakes—and this argument & documentation of slander/libel is **\*\*not\*\*** meant as disrespectful of the judge or the court.*

**Prayer(s) for Relief:** Therefore, please review and rule on my motion for intervention, filed *instanter*, granting speedy relief to effect justice for both Defendant, Mr. Daniggelis, as well as Intervenor, Mr. Watts.

Arguments defending this position are on docket, as This Court has been good enough to grant extensive **Procedural Due Process** and document (by docketing) the sworn affidavit and arguments of the undersigned Intervenor—in prior filings he has submitted within the last several years to the Chancery, Civil, and Law Divisions of the Cook County, IL circuit/trial courts.

While a “CASE SET ON TRIAL CALL” [whether “bench trial” or a “trial by jury”] might theoretically grant justice, this is passing the buck; **and**, as The Court created this problem (by transferring title without legal justification—a brute show of force, and no more), therefore the court, which created the problem should decline to “pass the buck” to a “trial call,” and, instead, solve that problem which it, *itself*, created. Now, I pray This Court speedily grant speedy **Substantive Due Process** on any & all claims of Redress which I've previously made—and which were made by Defendant, Mr. Richard B. Daniggelis.

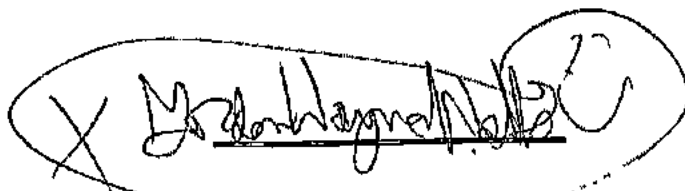
I realise that I'm effectively asking for a “Summary Judgment,” which is addressed and circumscribed by Local Rule 2.1(f) (“Filing motions for summary judgment in the Law Division”). This sub-section states *en toto*: “All motions for summary judgement shall be filed and duly noticed for hearing such that the motion comes before the court for initial presentation and entry of a briefing schedule not later than forty-five (45) days before the trial date, **except by prior leave of court and for good cause shown** or unless a deadline for dispositive motions is otherwise specified in the case management order.” [Emphasis added for clarity; not in original]

**Here is 'Good Cause':** Since the nature and magnitude of the injustices are egregious, and since the court and parties have all had very ample opportunities to hash out their arguments, it would prejudice no one should the court issue an order of show cause to Mr. Younes as to why title should not transfer back to its rightful owner—or (simpler & better yet), should the court issue a summary judgment as a matter of law—in favour of Daniggelis. **To decline to issue a summary judgment would fulfill the prophecy: “Justice delayed = Justice denied.”**

**Specifically,** This Court is asked to return title of 1720 N. Sedgwick St. to its rightful owner, Richard B. Daniggelis (**and** award damages as it sees fit for his numerous losses—not the least of which is the fact that he's losing huge amounts of monies paid out-of-pocket for storage of his belongings, as well, possibly, as rent to procure a replacement housing—so that he does not have to live on the streets or in his van—as was reported widely, in the recent past), unless The Court can offer an excellent, detailed, and coherent explanation to the contrary. [Note: While Judge Otto made valiant efforts to argue against justice here, none of his legal arguments were sound or persuasive, excepting the one pointing out that the trial courts had temporarily lost jurisdiction when the matter was on appeal. The mandate has issued, and that appeal is finalised, so no longer will that dog hunt: The trial court is responsible for cleaning up it own messes.] **Respectfully: If This Court disagrees with the legal arguments herewith, I hereby move The Court – and all of its judges – to grant a motion for clarification to the contrary. Barring that, relief is sought as previously requested.**

This Court may also (if it so chooses) invoke Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, and/or Rule 206(h)(Remote Electronic Means Depositions), etc., by calling movant at either of his two phone numbers of record: 863-688-9880 (home) and/or 863-409-2109 (cell).

Dated: This Thursday, July 06, 2017



**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

The undersigned Movant, Gordon Wayne Watts, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "Notice of Motion," and its exhibits were delivered to the following parties as indicated – this Thursday, the 6th day of July, 2017:

**LAW DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801  
Law@CookCountyCourt.com ; (312) 603-6930 ; (312) 603-5426  
Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

**Hon. Diane M. Shelley, Circuit Judge, Law Division:**

[Note: I may, for the convenience of the new judge, who replaces Judge Sanjay T. Taylor, include a few hard copies of old filings, but shall not serve them upon other parties, as I've already served them properly.] ;  
ccc.LawCalendarW@CookcountyIL.gov  
(312) 603-5940, (312) 603Diane.Shelley@CookCountyIL.gov-7551, (312) 603-4811  
Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

**Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)**

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Email: AndjelkoGalic@Hotmail.com ; AGForeclosureDefense@Gmail.com

134 N. LaSalle St., STE 1040, CHICAGO IL, 60602

(Note: The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)

**Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.), Email: RIndyke@SBCGlobal.net**  
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

**Mr. Robert J. More (Anselm45@Gmail.com)** I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

**Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

http://www.KingHolloway.com/contact.htm ; Attn: Peter M. King, Esq. PKing@khl-law.com

or: PKing@KingHolloway.com ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

(Note: Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.) I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

**Paul L. Shelton, Esq.**

E-mail: PMSA136@aol.com ; PLShelton@SBCGlobal.net As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

\* **Joseph Younes Law Offices / http://ChicagoAccidentAttorney.net** (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122 ; Fax: (312) 372-1408. Email is (or was?) Ro.Joe69@yahoo.com per http://www.ZoomInfo.com/p/JosephYounes/599467626 Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., **EXHIBIT-C** in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr.

Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: Younes' attorney Hugh Howard, c/o: Law Offices of Hugh D. Howard, 166 W Washington St, Suite 600, Chicago, IL 60602, Phone | 312-781-1002, Email | [Hugh@HughDHowardLaw.com](mailto:Hugh@HughDHowardLaw.com), per: <http://www.HughDHowardLaw.com>

**MERS (Mortgage Electronic Registration Systems, Inc.)**

<https://www.mersinc.org/about-us/about-us>

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: [JanisS@mersinc.org](mailto:JanisS@mersinc.org)

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

[SandraT@mersinc.org](mailto:SandraT@mersinc.org) – Director, Corporate Communications

Note: MERS is only being served electronically per above.

**I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “Notice of Motion,” and its exhibits, were served upon all parties listed above, this 6th day of July, 2017 by the following methods:**

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

- E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, infra-- linked at the “Mortgage Fraud” story, dated, Fri. 14 Apr. 2017.

Signature:  Date: Thurs 06 July 2017

Gordon Wayne Watts, *Intervenor, pro se*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880 (home) or: (863) 409-2109 (cell)

Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

Date: Thursday, 06 July 2017

**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

**Case law citations to the "Terri Schiavo"  
(aka: the Florida 'feeding tube girl') case**

**Exhibit-A**

**Court ruling & docketing information in the recent  
"Gay Marriage" case, heard before the U.S. 11<sup>th</sup> Circuit  
FEDERAL Court of Appeals, in Atlanta, Georgia**

**Exhibit-B**

**FedEx package refused by Atty. Joseph Younes**

**Exhibit-C**

**C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)**

**C-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)**

**C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)**



**Case law citations to the "Terri Schiavo"  
(aka: the Florida 'feeding tube girl') case**

**Exhibit-A**

\* **In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)**,  
No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)  
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

\* **In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO,**  
**GUARDIAN: THERESA SCHIAVO**, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing.  
(Bush got 0.0% of his panel before the same court)  
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

\* **Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo**, 403 F.3d 1223, 2005 WL 648897 (11<sup>th</sup>  
Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of  
their panel on the Federal Appeals level)  
<http://Media.ca11.UsCourts.gov/opinions/pub/files/200511556.pdf>

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

Court ruling & docketing information in the recent "Gay Marriage" case, heard before  
the U.S. 11<sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, Georgia Exhibit-B (1<sup>st</sup> of 3 pages)

[January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne  
Watts' (Pro Se) motion for leave to file an amended *Amicus Curiae* brief and denying Mr. Anthony Clare  
Citro's (Pro Se) motions for leave to file out of time and for leave to file as *Amicus Curiae*]

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 2

IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

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No. 14-14061-AA

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JAMES DOMER BRENNER, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

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No. 14-14066-AA

---

SLOAN GRIMSLEY, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

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Appeals from the United States District Court  
for the Northern District of Florida

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FILED DATE: 2/27/2019 7:28 PM 2007CH29738

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Case: 14-14061 Date Filed: 01/06/2015 Page: 2 of 2

ORDER:

Clare Anthony Citro's motions for leave to file out of time and for leave to file a brief as *amicus curiae* are DENIED.

Gordon Wayne Watts's motion for leave to file an amended *amicus curiae* brief is GRANTED.

  
UNITED STATES CIRCUIT JUDGE

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 1

**UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING  
56 Forsyth Street, N.W.  
Atlanta, Georgia 30303

John Ley  
Clerk of Court

For rules and forms visit  
[www.callec.uscourts.gov](http://www.callec.uscourts.gov)

January 06, 2015

Anthony Citro  
254 SW 7TH ST  
DANIA, FL 33004-3948

Gordon Wayne Watts  
821 ALICIA RD  
LAKELAND, FL 33801-2113

Appeal Number: 14-14061-AA ; 14-14066-AA  
Case Style: James Brenner, et al v. John Armstrong, et al  
District Court Docket No: 4:14-cv-00107-RH-CAS

This Court requires all counsel to file documents electronically using the Electronic Case Files ("ECF") system, unless exempted for good cause.

The enclosed order has been ENTERED.

Sincerely,

JOHN LEY, Clerk of Court

Reply to: David L. Thomas, AA/rvg  
Phone #: (404) 335-6169

MOT-2 Notice of Court Action

**FedEx package refused by Atty. Joseph Younes** **Exhibit-C**  
**C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)**



April 26, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number 7862-7122-6226.

---

**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivery location:</b>	821 ALICIA RD Lakeland, FL 33801
<b>Signed for by:</b>	Signature not required	<b>Delivery date:</b>	Apr 26, 2017 09:53
<b>Service type:</b>	FedEx Ground		
<b>Special Handling:</b>			

**NO SIGNATURE REQUIRED**

Proof-of-delivery details appear below; however, no signature is available for this FedEx Ground shipment because a signature was not required.

---

**Shipping Information:**

<b>Tracking number:</b>	7862-7122-6226	<b>Ship date:</b>	Apr 18, 2017
		<b>Weight:</b>	1.8 lbs/0.8 kg

**Recipient:**  
JOSEPH YOUNES LAW OFFICES  
JOSEPH YOUNES LAW OFFICES  
166 W WASHINGTON ST  
STE 600  
CHICAGO, IL 60602 US

**Shipper:**  
gordan watts  
gordan watts  
821 ALICIA RD  
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

FedEx package refused by Atty. Joseph Younes

Exhibit-C

C-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

Reminder: AOL will never ask you for your password or billing information. [show images & enable links](#)

**Subject:** FedEx Shipment 786271226226 Delivery Exception  
**Date:** 4/21/2017 10:24:46 P.M. Eastern Daylight Time  
**From:** TrackingUpdate@fedex.com  
**Reply To:** trackingmail@fedex.com  
**To:** A.yw1210@aol.com  
*Sent from the Internet (Outlook)*

---

**Tracking # 786271226226**

Ship date: Tue, 4/18/2017	Scheduled delivery: Mon, 4/24/2017 by end of day
------------------------------	--

Delivery exception

---

**Shipment Facts**

FedEx attempted, but was unable to complete delivery of the following shipment:

<b>Tracking number:</b>	<u>786271226226</u>
<b>Status:</b>	Delivery exception
<b>Service type:</b>	FedEx Ground
<b>Packaging type:</b>	Package
<b>Number of pieces:</b>	1
<b>Weight:</b>	0.70 lb.
<b>Standard transit:</b>	4/21/2017

---

**Resolving Delivery Issues**

The reason delivery was not completed is outlined below. Where applicable, resolution recommendations are also provided.

Exception Reason	Recommended Action
1. Refused by recipient - Not ordered	No action is required. The package is being returned to the shipper.
2. Shipment Refused by Recipient	No action is required. The package is being returned to the shipper.

FedEx package refused by Atty. Joseph Younes

Exhibit-C

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

(409) 888-8888  
821 ALICIA RD  
LAKELAND FL 33801  
US

Joseph Younes/599.467626  
\$5716, per website

**FedEx RETURN TO SHIPPER**

Dear Customer - This package is being returned.

Hold at Location - Expired.

Delivery refused by: Joe

Because

- Incorrect delivery address/Recipient unknown/Closed.
- Damaged. An inspection report has been completed.
  - The entire contents of the package are enclosed.
  - Damaged contents were discarded. The balance is enclosed.
- Package is greater than the maximum size/weight allowed.
- Delivery attempt(s) unsuccessful/unable to reach recipient for alternate delivery instructions.
- Improper HazMat packaging/labeling/documentation.  
ATTN FedEx Personnel: Attach the OP-908 & SF-436 to all Hazmat.
- Other:

Package received on trailer from shipper:

- Crushed
- Wet
- Open
- Inadequate Packaging
- Oversize
- Overweight

RETURN STATE: FL

TO:

RETURN ZIP: 33801

TO:


Remove label here

1862 7122 6226

4-21/1944

60602

9622 0417 3 (000 000 0000) 0 00 7862 7122 6226



Joseph Younes Law Offices  
166 W WASHINGTON ST.  
Phone: (312) 372-1122 : Fa  
Email is (or was?) Roloc69



9621912271305556326257

220-1580

60802-2015-03

JOSEPH YOUNES LAW OFFICES  
166 W WASHINGTON ST  
CHICAGO, IL 60602

SMRAG LABEL, REV/03/10 - RUN 1/2017

FACILITY:

NLP

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION**

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
**Plaintiff,**

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, *et al.*,  
**Defendants, and**

Gordon Wayne Watts,  
**Proposed Intervening Defendant.**

Case No.: 2007 CH 29738

Before: Hon. DIANE M. SHELLEY,  
Circuit Judge

Case Type: CONTRACT  
District: First Municipal  
Calendar "W", Courtroom 1912

**TIME-SENSITIVE** to be heard  
in Court Room: 1912 by 07/19/2017  
Court Time: 10:30am (CST)

FILED  
2017 JUL 17  
COURT CLERK  
CHANCERY DIVISION  
10:55 AM

~~[Sworn, Witnessed, and Notarised]~~  
**AFFIDAVIT OF GORDON WAYNE WATTS**

ORIGINAL  
SIGNED  
COPY

STATE OF FLORIDA  
COUNTY OF POLK

Before me, the undersigned Notary, on this 5<sup>th</sup> day of July, 2017, personally appeared Gordon Wayne Watts, known to me to be a credible person and of lawful age, who first being duly sworn, upon his oath, deposes and says:

**AFFIANT STATEMENT:** I, Gordon Wayne Watts, declare (certify, verify, and state) under penalty of perjury under the laws of the United States of America and the States of Florida and Illinois that the following statement is true and correct to the best of my knowledge:

I personally know Richard B. Daniggelis, a defendant in the above-captioned case, and who was named as a defendant in at least four (4) cases related to the same subject matter: Deutsch Bank v. Daniggelis, et al. (2004-CH-10851), GMAC Mortgage et al. v. Daniggelis, et al. (2007-CH-29738) [heard in CHANCERY and transferred to the LAW DIVISION, e.g., the above-captioned case, thus counting as "two" cases], and Younes v. Daniggelis (2014-M1-701473). Mr. Daniggelis made me aware of mortgage fraud; while I believed him, I had no proof of it. However, I later obtained proof of fraud and discovered that This Court hadn't been made aware of much of the proof that I found through my own private research. So, I felt moral obligation to bring this to The Court's attention via a previously-filed a "Friend of the Court" brief with This Honourable Court in all of the above-captioned cases, excepting the Deutch Bank case. – I submitted: Statements of Facts, Documentation to Verify, and Arguments whereof.

**FURTHER AFFIANT SAYETH:**

(1) HOWEVER, after having done much research for Mr. Daniggelis (costing me time lost from work, labour, and public records fees to research and obtain numerous documents & facts, not to mention emotional distress), he has agreed to pay me monies owed; but, due to the situation of him having lost his house in mortgage fraud, this places, upon him, a financial burden *frnt that Mr. Daniggelis has lost due to a cloud on the title, attorneys fees, & costs to obtain replacement housing and storage for his belongings, at the least.*

(2) While *Amicus Curiae* briefs are not a matter of right (but at the court's discretion), nonetheless, I know that his hardships reduce the chances of him paying me what is owed, thus giving me an absolute right to Intervene under 735 ILCS 5/2-408(a)(2) because "the representation of the applicant's interest [e.g., what he owes me in labour, time lost from work, and Public Records pull fees, etc.] by existing parties is or may be inadequate and the applicant will or may be bound by an order or judgment in the action."



(3) Moreover, I state, for the record, that I have the right to intervene under 735 ILCS 5/2-408(a)(3) because "the applicant [the undersigned Affiant] is so situated as to be adversely affected by a distribution or other disposition of property in the custody or subject to the control or disposition of the court or a court officer."

(4) I am the sole author of this affidavit, the accompanying proposed "Motion to Intervene," and the related "notice of motion," as required by the rules of your court.

(5) Although I have previously submitted a sworn & notarised Affidavit in both the Chancery case (on 8/10/2015) and the above-captioned case (on 9/14/2015), as well as legal arguments, supporting documentation, and statements of fact (in my prior briefs), there have been several new developments (as well as overlooked facts & legal arguments) that compel me to take my valuable & limited time to carefully write up (hopefully) this last & final Affidavit (and related filings) to help shepherd Mr. Daniggelis' case through the court—and, of course, to avail myself of my Rights of Intervention, as proscribed by ILLINOIS statutory and case law:

My intervention as of right is asserted, and "the trial court's jurisdiction is limited to determining timeliness, inadequacy of representation and sufficiency of interest; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted." City of Chicago v. John Hancock Mutual Life Ins. Co., 127 Ill.App.3d 140, 144 (1<sup>st</sup> Dist. 1984). [Emphasis added in underline & bold; not in original] I satisfy all three requirements, giving me rights to intervene under 735 ILCS 5/2-408(a)(3).

**NEW DEVELOPMENTS:** Very recently, I got an unexpected email response from (disbarred) Atty. Paul L. Shelton (the former law partner of Joseph Younes, and who conspired with Younes to defraud Daniggelis out of his house, title, and land), in response to me serving him his "service copies" of my filings, via email. (See attached.) Mr. Shelton has been very helpful, to me, in comparing notes and candidly discussing this case, and a few of his observations are worth bringing to This Court's attention: As we all recall, Shelton was not only stripped of his broker's license by the IDFPR, but subsequently, he was disbarred, and thus stripped of his IL law license, by the IARDC—and, in both instances, for mortgage fraud, as the publicly-accessible IL Records clearly show. (Both of Shelton's disbarments, above, made me suspect Younes, since both law partners were named defendants in numerous of Daniggelis' cases—also involving mortgage fraud.)

Mr. Shelton told me in his May 16, 2017 reply (see attachments) that: "This is personal and confidential and I'm trusting that none of what I say here is used against me." For that reason [and because the 3 emails comprise fourteen (14) pages, which is a bit lengthy for the court's review], I'm hesitant to include his replies. HOWEVER, after reviewing his replies, nothing, in my opinion would do him any harm or injury. (His loss of law license means it can't get any worse, other than criminal charges, and nothing he said makes his case any worse. In fact, I have hopes that if he "turns state's evidence" & helps The Court by testifying, he can get some form of leniency or partial reinstatement.) MOREOVER, This Court need not read through the minutiae of our email exchange, but I must include, in relevant part, key portions, "in context," of our exchange to verify & demonstrate genuine authenticity, e.g., that it was Mr. Shelton (not myself) who wrote his reply.

The key thing that Shelton tells me is that: "But in reality, he [Daniggelis] gave her [Erika Rhone] POA and she had [legal] right to alter deed, even date, "forge" it or sign properly as attorney in fact. That is the judges point." [Comments in bracket to clarify; not in Shelton's original reply.] While this may seem irrelevant to the casual reader (what 2 non-Lawyers are discussing), I include this "new development" because I believe sitting judges may accept this wrong view of statutory and case law: As This Court can see in my "Thu, May 18, 2017 at 6:56 AM" reply to Atty. Shelton, he's incorrect, & I cite several sources to verify, including LeagleBeagle.com, Caring.com, LegalZoom.com, StandardLegal.com, and NationalNotary.org, all which all clearly state that you can not "forge" another person's signature, even if you are their POA (Power of Attorney), and moreover, you must make it clear that you are signing *\*as\** the POA for the principal. In fact, StandardLegal clearly states that: "When signing on behalf of a Grantor as Attorney-in-Fact, you should always sign YOUR OWN NAME, followed by the words "Power of Attorney".

Do NOT sign the Grantor's name — EVER!

By signing your own name with the words "Power of Attorney" after your name to any contract or other legal document, the person receiving the documents signed by you on behalf of the person who granted you the Power of Attorney understands exactly what is being provided." <http://www.StandardLegal.com/blog/if-i-have-power-ofattorney-how-do-i-sign-legal-documents-on-behalf-of-my-grantor>

Shelton goes on to say (see email exchanges) how he was trying to help Daniggelis and now regrets it, and he implores me to not waste my time with him. Shelton also answered legal questions about whether one needed their own money at closing, and the difference between a mere notice of deposition and an official & binding subpoena. Finally, Shelton goes on to say:

"A lot of your legal arguments are very valid...but you are fighting for a liar and scammer. I firmly believe that. Your resources are being wasted in the eyes of God." [In his 5/16/2017 11:14:43 P.M. Eastern Daylight Time reply] and: "Good luck but please leave me alone if possible." [In his 5/16/2017 6:49:24 A.M. Eastern Daylight Time reply, that morning].

I agree with Shelton on some of what he says (about the strength of my legal arguments), but disagree that it is a waste of time, and I'm hoping that This Court does not prove him right on this point. He asks me to leave him out of it "if possible," but since he's a material witness in the criminal Grand Theft of a house and land, by means of clear & obvious forgery, he can't be "out" of it except by leave of This Court, and even that (if the court issued such an order) would be contrary to loads of case law & statutes regarding witnesses, crimes, etc.

**\* Relevant Legal Arguments which came up in newly-discovered email exchanges with SHELTON \***

But, in short, I include our email exchange because I believe his claims that the judges may have used this (incorrect) legal standard, namely, falsely assuming that a POA could legally forge the signature of the principal. (And, I school him on the terms of the contract, showing that even assuming the POA existed, it was a "limited" POA, limited both by scope and time, and both made it illegal to transfer title, as it was for a sale, not a quit claim, and no sale ensued as there was no payment to Daniggelis—and his signature was clearly forged.

**\* Overlooked Legal Arguments & Statements of Fact that DANIGGELIS has desired to be included \***

Richard Daniggelis has told me, on numerous occasions, of his desire to include both certain legal arguments and certain recollections of which his attorney, Andjelko Galic, did not include in his filings. As I'm intervening as a matter of right, I have a right to include said "orphaned" legal arguments and statements of fact:

- 1) Richard has repeatedly asked me why Younes didn't evict him right away, after having gotten "legal" title to the house, from Judge Otto's ruling and/or Judge Diana Rosario's order in the Civil Court. Mr. Daniggelis clearly told me that he felt Younes was afraid of being found out for mortgage fraud, or else he would've evicted him sooner.
- 2) Mr. Daniggelis also told me that Judge George F. Scully, Jr., who apparently was assigned the civil division case, at one point, said (in open court, I think) that he had had lunch with Judge Michael F. Otto (who was a Chancery judge for Daniggelis' case at one point). **Daniggelis then said that shortly thereafter**, Judge Scully adjured & warned Younes to "be careful for what you ask for—you just might get it" or words to that effect. While I'm not sure of what legal significance this might have, Daniggelis said that he felt that Scully & Otto had discussed the matter privately at lunch, and I include it in my statements, in order that the record not be lacking. (As this is probably the last chance to include relevant filings—I want to give The Court all the tools it needs to do its job.)
- 3) As further clarified in "Exhibit-D" of my 04/17/2017 filing to This Court, Richard asked me to

search for & locate documentation which would support his theory that Younes' complaints to the Office of the Attorney General (OAG) intimidated the banks & title companies, thereby blackmailing them into colluding to commit R.I.C.O. Crimes—and intimidated into giving him a “sweetheart” loan modification. [While it's harder to prove collusion or intent, it's a matter of record that the bank did, in fact, reduce both the interest and principal of Younes' loan by huge amounts—as I clearly document.]

- 4) When discussing this matter with one mutual friend, has asked me if the original signature (you know, the one I'm alleging is forged) could be produced by the banks and/or Atty. Joseph Younes. My friend was implying that since Daniggelis' signature was forged (he's a mutual friend of Daniggelis and myself, and believes Daniggelis' claims), no original existed: It was a photocopy, e.g., felony forgery fraud. Since my friend's observation is good, I include it in my overlooked legal arguments, here.
- 5) **This Court** is fully aware of the fact that John LaRoque has continued to (illegally) evade deposition by Daniggelis' attorney, Andjelko Galic. While I don't know what Galic might ask him (nor do I know what LaRoque is trying to hide), it's painfully obvious—even to any blind person—that John LaRoque is trying to hide something, and I think that “something” is further proof/details of the forgery fraud.
- 6) Richard repeatedly told me that when people hear he signed the POA & the first Warranty Deed (where his signature wasn't forged), they automatically think that this is proof that he just “gave away” the house. Because of that, Richard has been trying (in vain, I might add) to somehow convey to This Court that this isn't true—and offer a sound legal explanation. Since Richard is unable (and his attorney is either unable and/or unwilling), I shall do so—since it represents my interests in Intervention: Richard told me (repeatedly) that other attorneys had previously had him sign Warranty Deeds (like he did here) to help them in their negotiations to discuss refinancing, part-ownership shares, or other matters—and that, in no instance did any attorney try to take title. Because of this, when Younes & Shelton asked Daniggelis, in like-manner, to sign a warranty deed & POA, he believed it was necessary for the transaction—and that it was not his intent to simply “give away” the house—based on past attorney interactions—and based on what Younes & Shelton told him—in their official capacity as attorney at law.
- 7) Daniggelis has said (or implied) numerous times that people view him as helpless & pushover because of his advanced age (I think he is 78 year-old or so, at this time), and that they think it would be “unwise” to allow him to hold title. But, since Daniggelis has said that he thinks he can get a reverse mortgage and/or sell shares to Investors, and/or rent out rooms, therefore these arguments (about his age and alleged inability to manage the house/land) must be rebutted and resisted. **Here, I am so doing.**
- 8) Daniggelis has said that, at one court hearing (I think, while waiting for court to convene) that Younes said that he wanted to “wash his hands” of 1720 N. Sedgwick, since it was becoming more trouble than it was worth. While I'm not sure of any “direct” legal relevance, here, this recollection (and others above) that Daniggelis made might be useful in helping understand the issues. So, since Daniggelis can't enter them into the record—and since I have legal rights of intervening, I shall do so, here.
- 9) Oh, and perhaps the most interesting (and possibly useful) recollection that I must add is *this* one: When Judge Michael F. Otto, the Chancery Division judge for GMAC v. Daniggelis (the case that was transferred to the Law Division, the above-captioned case) entered his 5/15/2014 order snatching title from Daniggelis—and giving it to Younes—**Mr. Daniggelis tells me that he jumped up in court and blurted out to the effect of: “Hey, if I were not the true owner of 1720 N. Sedgwick, then why was there a huge monetary judgment settlement by Stewart Title to me, for such-and-such amount!?”** Mr. Daniggelis tells me that Judge Otto was startled & possibly frightened by the fact that he'd just entered an incorrect order, but that he was unwilling to admit any wrongdoing, and—instead—Daniggelis tells me that Judge Otto “passed the buck” and said: “Ah, we're going to have to transfer this case to the Law Division,” or words to that effect. [I would add: 'Passing the Buck' is not good practice, and diminishes the reputation of the court—since, of course, The Buck Stops Here, and the matter should be decided here—and not elsewhere.]

**Closing statement:**


I fully know, realise, & understand that This Court has received lots of lengthy written filings from me, and I'm not joyful or happy at the thought that it might be difficult to read (because of the length).

*[Just remember, tho: As hard as it may be to read, it was 10X harder for me to write, so please appreciate that.]*

I am not trying to make This Court's job harder—or be “vexatious” in any manner—since I know judges, clerks, & staff are all human, like myself. (And, as stated in my opening arguments in my Intervention, I inserted a rare apology for being slightly emotional with certain unnamed clerks. But, as Daniggelis is like a grandfather to me, and his repeated mistreatment—and this court's refusal to grant him justice—is like continually kicking a dog, **then I will compare myself with a “dog”** and say that while barking is not necessarily right, nonetheless, I beg Forgiveness and Pardon from This Honourable Court for being human: If you keep kicking a dog, it will eventually yelp.

Therefore, I respectfully submit this sworn, witnessed, & notarised Affidavit, which should serve as a legal proxy for the “Statements of the Case & Facts” in my legal briefs.

FURTHER AFFIANT SAYETH NAUGHT

  
~~Gordon Wayne Watts, Affiant~~

STATE OF FLORIDA  
COUNTY OF POLK

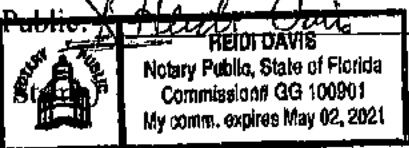
The foregoing instrument was acknowledged, subscribed, and sworn before me this 5<sup>th</sup> day of July, 2017, by GORDON WAYNE WATTS, Affiant, who (is / is not) personally known to me, who (did / did not) produce identification as shown below, and who (did / did not) take an oath.

IDENTIFICATION TYPE: Drivers License

IDENTIFICATION NUMBER: (\*) W320-299-66-176-0

(\*) In compliance with Rule 138, ILLINOIS SUPREME COURT RULES, “Personal Identity Information”. (b) (2), “driver’s license numbers,” I am not including my full Driver's License Number. However, in accordance with Rule 138 (c)(2), “A redacted filing of personal identity information for the public record is permissible and shall only include: the last four digits of the driver’s license number.” Therefore, I am asking This Notary to use only the last 4 digits.

See: [http://www.IllinoisCourts.gov/supremecourt/rules/art\\_11/art11.htm](http://www.IllinoisCourts.gov/supremecourt/rules/art_11/art11.htm)

Notary Public: Heidi Davis  


Date: July 5, 2017

My Commission Expires: May 2, 2021

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



Gordon Watts &lt;gww1210@gmail.com&gt;

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**Paul, this is Gordon, again... Something odd's happening...**


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Gww1210@aol.com <Gww1210@aol.com>  
 To: plshelton@sbcglobal.net  
 Cc: Gww1210@aol.com, gww1210@gmail.com

Tue, May 16, 2017 at 10:17 PM

Wow - you have taken quite a bit of time to respond to me in great detail, twice, just now; Thank you, Paul.

I will try and reply to each point in both of your emails in one response, -- and 'interleave' my replies below each of your responses, for clarity --  
 As email is usually done, I will put your more recent response on top, and I'll respond in bold-faced dark green for clarity. (So, that means you'll read it from the bottom up, like usual.) -- see below... [[I will number my points to make it a bit easier.]]

**In a message dated 5/16/2017 7:06:26 A.M. Eastern Daylight Time, plshelton@sbcglobal.net writes:**

Gordon

You need to get past the "forgery". Richard is a liar. He gave what's her name a POA so he could make all these fraud claims. But in reality, he gave her POA and she had right to alter deed, even date, "forge" it or sign properly as attorney in fact. That is the judges point.

[[ #10 ]] Wow, finally some thoughts or a counter-argument. Thank you, Paul!! While I think I'll respectfully dissent, know this solemn axiom: I don't get smarter by asking views or feedback from people who are 'yes' men/women - and only agree with me!.. Anyhow, I saw the record: While there "was" a POA, it obviously wasn't as powerful as you suggest -- otherwise, the title would have transferred on the May 2006 deed, and Younes kicked him out with a 5-day notice back then. Besides, the POA I see in my record <http://gordonwaynewatts.com/MortgageFraudCourtDocs/2007-CH-29738-LAW-DIV-Sept09-2015-Motion-Amicus-Exhibits-GordonWayneWatts.pdf> or <http://gordonwatts.com/MortgageFraudCourtDocs/2007-CH-29738-LAW-DIV-Sept09-2015-Motion-Amicus-Exhibits-GordonWayneWatts.pdf> see "Exhibit Watts-G," was good only until June 30, 2006, when it became irrevocable (and was revoked by the affidavit of forgery put in the recorder's office, remember?), meaning that the July 09, 2006 'signature' -- even if possibly with the POA, before then, wasn't possible afterward, as the POA had expired. (But good argument!)

Besides, "Exhibit Watts-F," was the same copy, but not notarised, meaning the notary stamp was illegally put on after-the-fact (unless someone had a photocopy machine at that Starbuck's that day, to scan a before & after - not likely). But, unless Rhone testified that she used the POA for that purpose (and she didn't, I don't think), it is clear that fraud occurred.

Note also, it was a 'limited' POA, for a real estate 'transaction,' to an outright quit claim deed transfer - big difference. A transaction is more than merely deeding over the property, and, again, no consideration is an issue, below...

The deed was a valid transfer instrument, in equity. She did what she did with his authority and the title co accepted it. End of story.

[[ #11 ]] But the lack of consideration was a stumbling-block, as I point out: *Stilk v. Myrick*, 170 Eng. Rep. 1168, 1168 (1809) (L.R.C.P) (Ellenborough, L) (holding a renegotiated contract void due to lack of consideration). Danlggelis wasn't paid, which voids any 'transfer' on that grounds too.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**Please keep in mind I am not a liar, and I have no reason to lie now!**

**[[#12]] by and large, believe you, Paul - but I still have doubts about Daniggelis' claim that you & your wife testified that she witnessed something he signed, when he says she never met him. And, the fact you have Exhibit-F in my attached brief, here not notarised, but Exhibit G was? How was that possible? Probably, someone notarised this after he signed it - again, not the worst crime (people do it all the time - and Daniggelis DID admit to signing it), but still a fib is a fib, and unnecessarily gives you a bad name if Daniggelis is correct here.**

**And I tried to help Richard. A waste of a lot of time. I feel stupid about it now. He lied to me and was hatching his plan to claim he was wronged. This is a man who inherited the building free and clear,**

**[[#13]] Actually, he says the he bought out his siblings' shares - and, I'm guessing, at a substantial cost. (I think he has no reason to lie about this, but I admit I don't know all the fact - and this point is really unimportant to the criminal aspects.)**

**sold the garage for profit; refinanced multiple times and never made a payment and used the cash out to do who knows what cause the place is a pit. He filed BK many times by himself. Like I say dumb like a fox. He was at the end of the line and the women beguiled him and "convinced" him to sell to an investor, live there 6 months and move. Richard agreed, but hatched his real plan to cry ignorance and nativity and fraud. It's worked. I helped him out and tried to get him to write his book; I spoke to him for hours about his life and plan.**

**[[#14]] He does talk *and talk and talk!*. (And, just between you & me, Richard agrees with me & thinks you are much more honest than Younes, and even told me how you said that you couldn't stand Younes any longer and had to stop being his law partner. Rich thinks and hopes that you will turn state's witness and help us win, which would be appropriate if, in fact, laws were broken.)**

**Even if Rich made stupid financial decisions & bit off more than he could chew, nonetheless, 2 wrongs make not a right, and, while I like the strength of your POA argument above, I think it's clear that Erika Rhone's scheme didn't work, since her POA expired, and was legally revoked. Even if a judge says otherwise, I still am not convinced. (Let's not forget the side-agreements that limited the POA for use of paying arrearages, etc. Since title didn't transfer on the May 2006 Warranty deed, this is proof of the side-contracts existence, which limited this transfer; otherwise, title would have not had to wait til the July 2006 warranty deed!**

**Besides, Paul, even *\*\*if\*\** what you're saying is true about her use of the POA, she would have had to sign her OWN name, and invoke the POA, to make it legal. Otherwise, she was committing a forgery. I'll give you an example: Even IF I hired a security guard, and gave him permission to enter a property I (theoretically) owned, it would be illegal for him to impersonate ME and try to enter it. Rhone, if she was the one forging the signature, is still guilty of forgery. Just remember, a POA does NOT give any person license to break the law, and forgery is still criminally illegal - and has no statutes of limitations. Moreover, there were 'acts of furtherance' committed more recently (Younes' continued attempts to gain property via forged signature, and knowingly dealing in styolen property), which I think will (a) possibly convince the State's attorney supervisor to overrule Asst. State Atty. Thomas Simpson on this point, and (b) convince the IARDC to revoke Younes' law license.**

**Remember, Paul - even if Younes "got away" with this due to statutes of limitations expiring, there was a local teacher in my area who, while unable to be "criminally" prosecuted for making a sexual joke to a student, will probably get fired as a teacher. A lawyer need not break a criminal law to be disbarred - as you found out the hard way. Younes is, in my view, MUCH more guilty than you, and if the IARDC doesn't disbar him SOON!!, I will probably contact John Kass and friends and inform them that the IARDC admits (and/or knows) that criminal acts were committed that were "untouchable" due *\*solely\** to SOL (Statutes of Limitation) issue - and that the IARDC is saying that you can commit a crime and still be an attorney in "Crook County," IL so long as the SOL expire! ... not. SOL also stands for sh-t out of luck, and that is the case, as Younes is obviously much more guilty than you, and will sooner-or-later face even harsher sanctions, if there is a God. - .. - .. There *\*is\** a God.**

He convinced me he would move out and go to his sisters. The place was simply mortgaged out. Check the records. He has you now working for free, all to keep squatting for free.

[[#15]] Ah, "mortgaged out": a term meaning that he To borrow more than is necessary to secure the purchase or improvement of real estate. Yes, but no proof of payment exists, so even so, the 'contract' is not valid: *Stilk v. Myrick*, 170 Eng. Rep. 1168, 1168 (1809) (L.R.C.P) (Ellenborough, L) (holding a renegotiated contract void due to lack of consideration). Daniggelis wasn't paid, which voids any 'transfer' on that grounds too.

But, anyhow, Karen Shanner, formerly with Steward Title, allegedly testified that you & others broke a bunch of broker rules. AND, if you knew the title was transferred on a forged signature & didn't speak up, you were at fault. (But maybe you believed Rhone had POA permission, even tho I know that no POA authorises anyone to break a law, like forgery, etc.)

There is a better client for you. Richard simply is a scammer. He sucked all the equity from the place and his time is up.

[[#16]] OK, even he admits he spent a little bit of it for improvements, and such, but this is de minimus if crimes were committed. Rhone can't simply break a law because of a POA - that is absurd!

I wish you'd move on to someone who deserves your work.

You've convinced yourself Richard is honorable. But he is not.

[[#17]] Well, while Daniggelis is argumentive and talkative, I don't accept your legal analysis. (But am open to being wrong! Remember, I admitted to Judge Otto that I was wrong about teleconferences for people like me in Florida, and that it was only optional, not mandated!)

C'est la vie.

[[#18]] *Such is life: that's how things happen. I wish blessings upon you too, but if you are indeed guilty of lying about witnessing / notarising that Exhibit-G in my PDF attachment, in this email, and/or wrong in your assessment that Rhone could commit a forgery & break the law, you should admit where you're wrong - but only IF you're wrong, and for nothing more. Defend yourself where you're innocent, which is true for the vast majority of the Issues.*

Blessings

Paul

Sent from my iPhone

On May 16, 2017, at 3:18 AM, Gww1210@aol.com wrote:

Paul, this is Gordon, again...

**In a message dated 5/16/2017 6:49:24 A.M. Eastern Daylight Time, plshelton@sbcglobal.net writes:**

This is personal and confidential and I'm trusting that none of what I say here is used against me.

[[ #1 ]] While I will admit that I think you and/or your wife may have lied about my friend, Richard Daniggelis (regarding her alleged witness of his signing something), I have absolutely no motive to betray your confidence or otherwise do you harm. (While I'm far from perfect, Paul, please remember that even when I was convinced you were the 'main' bad guy, I was trying to encourage you to hang in there - and also see what solution I could propose that would be fair to all - AND, even now that I'm sure that Joseph Younes **\*\*KNOWINGLY\*\*** took title of a house, when he **\*\*KNEW\*\*** that the transfer was

done using a forged signature (I KNOW he knew, because I notified him, hello!), and I'm convinced that he's FAAAR more criminally-guilty – and quite evil to boot – nonetheless, even regarding Younes, I don't wish to seek for him to be made homeless or even unemployed (tho some of that may eventually result anyway).

So, what I'm saying is this, Paul – even tho I'm sadly VERY human & make mistakes, if I don't even wish revenge (but merely punishment) on Younes, I certainly don't want to kick "you" while you're down, in any way, if I can help it. (I'm guessing you were probably guilty of something small, but were punished far more than you should have been. I say that because I believe Daniggelis has no reason to make up a story and falsely accuse you & your wife of lying on the stand. So, I VERY much believe you & your wife lied about her witnessing his signature, and would like to hear your take on why Daniggelis said this – and come clean, if his accusation is correct – but, even if true, all agreed that Daniggelis signed the POA, and so lying about a notary witnessing it, while wrong & illegal, is a self-inflicted unforced error, and not at all as criminally-illegal or as morally-immoral as what Younes did, in taking a house while knowing it was done on a forged signature – and then bragging to Daniggelis that he was "distanced" or "separated" from the actual crime.

Please come clean on this small point – or else defend yourself in the best way you know how: not only am I curious, but moreover, this will come back to haunt you if you don't address it.

I did nothing wrong as to Richard, deep down Richard knows the truth. I lost time and money on Richard, trying to help him. He fooled me. The real culprit was the African American girl, can't remember her name,

[[ #2 ]] I think it may be Erika Rhone?...

she had POA over Richard, and brought Richard to me. She is dumb like a fox and was very attractive too and used that to manipulated people. Richard was one of many she figured out away to make money upon. I saw closed deals with her where her company netted \$80-100k on flipping to a 700 credit "buyer". She'd buy a two flat in depressed black neighborhood for like \$80k do a quick rehab and "sell" it to someone for \$240k making that nice profit for rehab costs to her company.

I have to think on this, the LaRocque issue. He was once my best friend and only supplied the money which is not illegal.

[[ #3 ]] I spoke \*briefly\* by phone with Lou Brydges (by phone - after pestering him a lot via email & phone voice mail messages), and he says the same thing; While I know you don't like him, I'm glad both of you weighed in. Moreover, Robert J. More, the weirdo "vexatious litigant" character who was the infamous unpaying tenant of Daniggelis, is like an idiot savant on case law (but with no common sense), and when I asked him the same question, he said he saw no reason that it would be illegal for Younes to borrow money from LaRocque to do a closing. I think Mr. More's logic is sound, and, except for possible credit-worthiness issues (where some obscure law might require a person to prove their credit or financial mojo is good), I tend to agree. Thanks once again for clarifying what happened – and what is legal here. After I asked him if he remember my Fla Supreme Court filings, Brydges did, however, say he was impressed with my 4-3 loss in the Fla Supreme court in re Terri Schiavo, the famous 'feeding tube' girl, and said, in his view, it was a win, since I came so close to winning against stacked long odds. I sort-or agree.

No reason to take his testimony at all. It was just another investment. He is quite rich so I just think he doesn't want to waste his time.

[[ #4 ]] That sort of makes sense, and thx 4 offering your thoughts. But if Galic keeps seeking to depose him, and LaRocque keeps hiding, this smells, to me, like there's something there. (Why else would Galic pursue, and why else would LaRocque hide? Avoiding wasting time is not motive enough in light of the risk if his ass being arrested, charged, and either fined or locked up - not to mention possibly losing his FINRA credentials.) Something doesn't seem right here, Paul, but I can't put my finger on it, and neither can Daniggelis or More – and Galic is not talking (Lawyer-client privilege, plus he wants to surprise LaRocque, so he's keeping silent & tight-lipped.)



| In reality though, Richard really has no case.

[[ #5 ]] Respectfully, I disagree: While Daniggelis (as a practical matter) may be in over his head in payments, etc., really, Paul, how could the transfer of title be legal in light of the fact that —a—, it's an obvious photocopy (identical signature, plus whiteout), and —b— Daniggelis didn't get paid either (no contract is valid without consideration e.g., payment). Plus, —c— Daniggelis has no motive to just give up the house & land with hundreds of thousands of dollars of equity, which makes the transfer even more criminal, in light of the stolen equity. (And, —d— sources tell me that there was usuary or otherwise illegal interest schemes, not to —e— mention that Linda Green fraud issue.) — really, Paul, how could any transfer of title be legal like that? If you're saying \*this\* is legal, then —f— (since a-e add up) I'll just go and forge a signature and take whatever I want!.. Oh, really?... .. —NOT.

| Certainly you can create one but I know the truth. Richard is dumb like a fox too.

[[ #6 ]] Yes, and even Rich admits he over-extended himself in trying to buy or otherwise build 2 houses, but 2 wrongs make not a right, and nothing can legally justify what happened to Rich. ONLY if he did a quit claim or something (which he didn't do) would it even be "possible" to consider condoning or otherwise supporting such an (otherwise illegal) transfer.

| She was just "dumber".

[[ #7 ]] Well, if she did the forgery, then yes — what comes around, goes around: "KARMA" is the eastern way of saying the Godly law of Sowing & reaping is true!... She'll get hers if she did the forgery — or knew about it and was silent — or both.

| He should eventually give up the house. He is still squatting, little birds tell me.

[[ #8 ]] Well, the house has NO roof, and is being rained on — but (spiritually-speaking, anyhow), yes, he's squatting.

| Good luck but please leave me alone if possible.

[[ #9 ]] Well, I believe you will eventually be summoned to testify — I can't guarantee it (and have no power and no much more influence, here), but if (as I am guessing) you're only guilty of lying about the notary witnessing Daniggelis signing a POA, my guess is you should come clean, which would gain you credibility, and then it would (greatly, I'm guessing) lessen the probability of you getting charged with doing and/or covering up the forgery. What? Sent from an iPhone? That nutty Robert J. more character just bought me an Android cell phone, and I'm discovering just how hard it is to type in on such a small keypad — I am amazed that ANYONE uses those things! And I only use it via WiFi (on my own modem or uptown with others' Wifi), as a 'plan' costs WAAAYY too much money. My own cell phone (863-409-2109) is a prepaid welfare phone — since the economy is so bad that even us right-wing Conservatives are lining up for social programs. My home phone, 863-688-9880, is much more "normal," altho it doesn't text or anything.

But, anyhow, if you're (almost 100%) innocent, you have nothing to lose and much to gain by following my example of speaking up about wrongs. You want to do that as a 'national' or whatever, right? Why not do so where it can make a difference. Capt. James T. Kirk, in *Star Trek: Generations* (a movie) told Capt. Jean-Luc Picard that ONLY when he was in the captain's seat could he make a difference — I'm \*old\* (just turned 51!), and you're what? Even older? We won't be here forever, Paul — only while we're in the 'Captain's Chair' can we make a difference — observe:

Star Trek: Generations (1994)



## Quotes

Showing all 38 items

Kirk: Captain of the Enterprise, huh?

Picard: That's right.

Kirk: Close to retirement?

Picard: I'm not planning on it.

Kirk: Well let me tell you something. Don't! Don't let them promote you. Don't let them transfer you. Don't let them do \*anything\* that takes you off the bridge of that ship, because while you're there... you can make a difference.

Picard: Come back with me. Help me stop Soran. Help make a difference again!

Kirk: Who am I to argue with the captain of the Enterprise? What's the name of that planet? Veridian III?

Picard: That's right.

Kirk: I take it the odds are against us and the situation is grim?

Picard: You could say that.

Kirk: You know if Spock were here, he'd say I was an irrational, illogical human being for going on a mission like that.

[pause]

Kirk: Sounds like fun!

14 of 14 found this interesting | Share this

source: <http://www.imdb.com/title/tt011280/quotes>

Blessings brother

Paul

Sent from my iPhone

On Tuesday, May 16, 2017, at 3:18 AM, Gww1210@aol.com wrote:

Paul, this is Gordon, again... Something odd's happening, & I wanted to pick your brain, ok?

GMAC v Younes, Daniggelis, Shelton, et al, 2007-CH-29738 <https://w3.courtlink.lexisnexis.com/cookcounty/Finddock.asp?DocketKey=CAAH0CH0CJHDI0CH> was transferred out of Chancery and into the Law Division, [https://w3.courtlink.lexisnexis.com/cookcounty/FindDock.asp?NCase=&SearchType=2&Database=2&case\\_no=&PLtype=2&sname=daniggelis&CDate=](https://w3.courtlink.lexisnexis.com/cookcounty/FindDock.asp?NCase=&SearchType=2&Database=2&case_no=&PLtype=2&sname=daniggelis&CDate=) and under the same case number to boot. In case you haven't noticed, Andjelko Galic, Daniggelis' attorney, keeps deposing John LaRocque, and LaRocque keeps evading

**deposition:** Obviously, he must feel he has something to hide. Judge Sanjay Tailor was threatening to dismiss the case if Galic couldn't get LaRocque into deposition - but a few things seem odd:

- 1) Why does Galic want to question him? To see who committed the obvious forgery, maybe? (The signatures on the two warranty deeds is IDENTICAL, as you well recall - and there's whiteout on the latter one, which was used to transfer title, after the 1st deal fell through, due to unpleasant side-agreements Daniggellis put in place.)
- 2) Why would LaRocque be afraid to testify? (Maybe Galic has some documentation to pin him down to testify on some point?..)
- 3) Judge Tailor is said to have suggested Galic not merely 'depose' LaRocque, but rather, issue a subpoena, something that (according to Daniggellis) he did not do. Why would he be afraid to issue a subpoena? (And, what's the difference in deposing him and issuing a subpoena, or maybe I'll ask Google that one!)
- 4) Lastly, Daniggellis thinks that maybe Joseph Younes, who eventually got title to the house (see my news item, below), was supposed to bring his own money to the closing, and didn't and that this broke some law. Could that be the reason Galic wants to depose LaRocque? My sources tell me that it's not illegal to go to a closing using someone else's money, and that it's merely borrowing it.

What are your thoughts on 1-4, here? Thanks!

Gordon Wayne Watts in Florida

*begin- copy/paste of news item:*

(Fri, 14 Apr. 2017; UPDATED Sat. 29 Apr. 2017, from Staff Reports; NEWS) **Courts** \* *Chicago Courts refuse to stop illegal construction/demolition: "Mortgage Rescue Scam" victim's house almost destroyed* \* **UPDATE:** As previously reported by *DNAinfo* ("**Rotted**' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, March 30, 2017 **COMMENTS**; and: "**Rotted**' Old Town Triangle House Owner Faces Daily \$1K Fine As Charges Fly," by Ted Cox, *DNAinfo*, April 07, 2017 **COMMENTS**; and: "**Rotted**' Old Town House Slated For Repairs As Fines Threatened Again," by Ted Cox, *DNAinfo*, April 28, 2017 **COMMENTS**), the house which was featured in our previous Tue. 01 Dec. 2015 story, linked here was almost destroyed, even in spite of repeated warnings to The Court's Chancery, Civil, and Law Divisions This story is developing; keep posted for updates. *The Register's* open-source docket, is accessible here with most or all key filings. [Perma-link to this story: [click here](#)]

*--end copy/paste of same.*

Gordon Wayne Watts, *editor-in-chief, The Register*

**In a message dated 4/18/2017 12:26:13 A.M. Eastern Daylight Time**  
**Gww1210@aol.com writes:**

Long time no see, Paul. Sadly, the only person that pays me for my hard work, here, is the Lord God, himself... (of course, through intermediaries, like family), but even my friends (who benefit) almost never repay or compensate me. I'm not even sure what an American National is, but I'm guessing it is like a Patriot, like when I used to have time to stand by the roadside (e.g., the Interstate Overpasses, which is where it got its name) with signs for the Overpasses for

America movement (which used to be called Overpasses for the Impeachment of Obama).

I personally know James Neighbors, the national founder for Overpasses, and Dallas Thurman, who is lieutenant; they're both on my Facebook. While they're generally conservative, they are also against corporate welfare and "Crony" capitalism, so it is more populist or libertarian in nature, I'd say. You know, it would help if you could volunteer some information about who executed the forgery. While there \*might\* be some short-term "legal pain," long-term, it would be the best investment. My guess is that you're \*much\* more honest than Younes, which is clear because he is unnecessarily rude (telling me to not call him back, when I called once a long time ago to apologize for not filing something informative & helpful sooner). But, no disrespect meant, when Daniggelis tells me you & your wife lied about a notary being present when he signed something (not sure why anyone would want to lie about that, as he freely admits that he signed it), I believe him, and I wonder why he would say that. He has said that you told him that Younes disgusted you or words to that effect, and that Younes was getting to be too evil "even for you" I thin were his exact (or similar) words. This suggests that Daniggelis thinks you're dishonest, but less than Younes.

I feel bad that there is the chance that you did something wrong (possibly Daniggelis was right about his claims you & your wife lied - I don't know, and must give both sides the benefit of the doubt, as a misunderstanding could have occurred, making both of you honest). But anyhow, no one I've ever spoken with (and no one I've ever "dealt with" - excepting the bad judge Otto character) disputed my assessment that the 2nd warranty deed was forged via a photocopy. Even Otto didn't outright dispute it, but rather made light of it in his ruling, suggesting that even if his court had jurisdiction on the merits (it was on appeal, then), that this new finding would not have made any difference. I'm calling bullshit on his claim, as it was pure B.S. His order, of course, is on my online docket, if you want to read it.

So, don't you think that it's pretty-much certain that the 2nd warranty deed used a photocopied signature of the 1st one? And, what should (or can) be done about that, now? What do you think about these tough questions? (Well, the 1st one wasn't tough: Easy for even a blind man to see it was forged, but the ramifications of the court system's refusal to fix it are a "tough" pill to swallow.) But anyhow, what you think of it? And, what are you doing now days?

Thanks,

Gordon W. Watts

**In a message dated 4/17/2017 8:05:13 P.M. Eastern Daylight Time, plshelton@sbcglobal.net writes:**

Gordan:

Interesting...do you make a living filing this stuff? Just wondering..

Are you familiar with how to become an American national?

Thanks

Paul L. Shelton

On Monday, April 17, 2017 7:15 AM, "Gww1210@aol.com"  
<Gww1210@aol.com> wrote:

Counsel,

I have filed an amicus curiae brief, with requisite motion. It is attached.

Let me remind everyone that there is a hearing in Room 1912, before Hon. Diane M. Shelley, Circuit Judge, Law Division, in this case, at 9:00am CST, today (Monday, 17 April 2017).

My brief has seven exhibits (up to Exhibit-G), but I am hesitant to include these in the email attachments (tho I may try after I electronically serve this brief), because the attachments are close to 20MB, and that might be a little large for some email servers.

You can pick up your copies of the exhibits here:  
[www.GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html](http://www.GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html)  
or here:  
[www.GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html](http://www.GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html)

The docket entry is dated "\*04/17/2017," and is pretty close to the bottom of the page. Or, you could wait for the hard copies, which I am working on sending right now. Should you lose these links, above, my docket of selected items is still linked through the front-page news item in question, on *The Register*, my namesake blogs.

Best,

Gordon Wayne Watts, *editor-in-chief, The Register*  
[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com)  
BS, The Florida State University, Biological & Chemical Sciences;  
Class of 2000, double major with honours  
AS, United Electronics Institute, Class of 1988, Valedictorian  
821 Alicia Road, Lakeland, FL 33801-2113  
Home:(863)688-9880 Work:(863)686-3411 Voice&FAX:  
(863)687-6141 Cell:(863)409-2109  
See also: [http://Gordon\\_Watts.Tripod.com/consumer.html](http://Gordon_Watts.Tripod.com/consumer.html)

Gww1210@aol.com ; Gww12102002@Yahoo.com

Truth is the strongest, most stable force in the Universe

Truth doesn't change because you disbelieve it

TRUTH DOESN'T CHANGE BECAUSE YOU DISBELIEVE IT

<http://GordonWayneWatts.com> / <http://GordonWatts.com>

Get Truth

"First, they [Nazis] came for the Jews. I was silent. I was not a Jew. Then they came for the Communists. I was silent. I was not a Communist. Then they came for the trade unionists. I was silent. I was not a trade unionist. Then they came for me. There was no one left to speak for me."(Martin Niemöller, given credit for a quotation in The Harper Religious and Inspirational Quotation Companion, ed. Margaret Pepper(New York: Harper &Row, 1989), 429 -as cited on page 44, note 17,of Religious Cleansing in the American Republic, by Keith A. Fomier, Copyright 1993, by Liberty, Life, and Family Publications. Some versions have Mr. Niemöller saying: "Then they came for the Catholics, and I didn't speak up, because I was a Protestant"; other versions have him saying that they came for Socialists, Industrialists, schools, the press, and/or the Church; however, it's certain he DID say SOMETHING like this. Actually, they may not have come for the Jews first, as it's more likely they came for the prisoners, mentally handicapped, & other so-called "inferiors" first -as historians tell us-so they could get "practiced up"; however, they did come for them -due to the silence of their neighbors -and due in part to their own silence. So: "Speak up now or forever hold your peace!"-GWW//

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Gordon Watts &lt;gww1210@gmail.com&gt;

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**Paul, this is Gordon, again... Something odd's happening...**


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Gww1210@aol.com &lt;Gww1210@aol.com&gt;

Wed, May 17, 2017 at 7:00 AM

To: plshelton@sbcglobal.net

Cc: Gww1210@aol.com, gww1210@gmail.com

Ah, that's the difference between a mere notice of deposition and an official & binding subpoena. Thank you for your detailed analysis, Paul. While your analysis seems foreign to me (and frankly a surprise that I wasn't expecting!), I must assume both possibilities could be true, and look at them for plausibility:

First off, while schemers & scoundrels do exist, I don't think it likely that Daniggelis would risk outright losing the house without any documented payment (other than a few home-improvement loans) for the chance to "get it for free," something I think he would view as unlikely. So, while - theoretically - your analysis is possible, I think it improbably or unlikely. Schemers, who try to steal elderly peoples' houses (those who are seeking refinancing, investors, etc.), also exist, and I think this possibility is more likely/probably. That's just my take, but thank you for the positive feedback on both my legal arguments and your well-wishes for me & my endeavors.

Actually, I \*didn't\* know the distinction between the notice and the actual subpoena, but then again, I'm not a lawyer (and barely even a legend in my own mind anymore!).

Now, if Rich were dishonest, as you suppose, why would he repeatedly adjure me to be respectful to my mother, listen to me & give me feedback when I want his opinion (like you're being kind enough to do), to listen to his (sometimes longwinded) analyses, and fight so hard for his house, with the aim of doing justice. A wronged person fights much harder. And, remember, he credits you for being much more honest than Younes, which, I think, he would not do were he dishonest. And, while he is as angry as hell (or putting on a good show!), he insists that he does not want to do Younes and great harm more-than-necessary to get his house back.

He insists that vindictive and petty vengeance is not morally right, and insists that he believes God will use this matter to show how both courts and "the average Joe" are all dishonest and corrupt, and that we need Jesus to help us be honest and follow god's ways; he has repeatedly said this, and as a man thinketh in his heart, so he does and speaks, and this suggests that you're reading him wrongly. **Also, it was \*your\* notary seal on the POA, which magically appeared on it after it was signed, scanned, & entered into the court record, suggesting it was probably signed after-the-fact - unless you carried a portable scanner with you when you presented it to him to sign, but I think this highly unlikely, and moreover, why would you scan in a signed, but not notarized, copy - and then notarize it and scan in a 2nd image? That makes no sense to me, and I'm sure you notarized it after the fact, getting the document from Erika, the black girl, who I thlnm met him at a local Starbucks.**

Since you haven't refuted my belief that you probably did notarize it after the fact (and didn't witness it), I believe you were guilty on this point. Either you were guilty of notary without witnessing or not - but either way, I don't want to bury you or kick you while you're down. **I know it can be hard & risky to address this, but whether you're guilty of the notarizing the POA after-the-fact (and without seeing him sign it) or not, you should address the matter truthfully, and quickly.** Get it out of the way. (Also, Daniggelis used you let poor people stay in his house's 1st floor, I hear from multiple sources, and I think he's more honest than you see, so please be open to that possibility.)

While I don't fully agree with you, thank you for trying to help me. Nonetheless, King Saul, ISRAEL'S first king, was guilty of offering sacrifices, and not obedience, as the books of Samuel in the Old Testament Bible recount. Please don't let that happen to you - it's good that you care about others' welfare (such as me) and try to clarify tough legal knots, but please also protect and defend yourself. You can be of NO use as an "American National," whatever that is, if you let your name/reputation be marred by the "notary without witnessing" allegation (whether

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true or not), and this all will prevent you from fighting for truly just causes (which I still think applies to Richard Daniggelis' case, notwithstanding your views). Even if Rich is dishonest, 2 wrongs make not a right, and we must fight the greater evils, and deal with Rich later. We must fight our own battles of honour and justice - and not be distracted by other things.

Gordon

In a message dated 5/16/2017 11:14:43 P.M. Eastern Daylight Time, plshelton@sbcglobal.net writes:

Gordan:

My main point about the Deed is that Richard sent the woman to the closing, with the knowledge and expectation that the property was being sold to Younes. So, in equity, he expected and authorized the transaction.

But, Richard is a liar and a scammer. He acted exactly as expected, and claimed the house was stolen from him, he never aithorized transfer, the deed was a forgery, etc.

Bottom line, Kharma is a bitch. What was expected to happen did finally happen. He continues to squat, pushing his lie and scam. A scorpion can still sting, even after the head is cut off. he was at the end of the line with refinancing, another bank was after the house in foreclsoure and he is very clever. You as a legal consultant (and a good lawyer too) can always make an argument for this guy...many scammers and liars have a legal argument...but the story is what it is...he is writhing and fighting as best he can.

Its not a complete anaology, but makes the case: the guy who murders someone, but gets away with it due to a legal technicality...he still did the act...

Richard is dumb like a fox...Hell he has gotten you to waste a lot of time an energy, when that time could have been spent on many others who really deserve it...

Alot of your legal arguments are very valid...but you are fighting for a liar and scammer. I firmly believe that. Your resources are being wasted in the eyes of God.

As for the subpoena versus Notice, the Notice of Dep was issued and I assume LaRocque agreed to appear; that's a much more agreeable situation...once the Judge allows you to issue a Subpoena for Dep it is a required appearance when served, at a set date and place, and the deponent can be held in contempt for not appearing...Not sure what the lawyer's thinking is...But you probably knew all that...

Blessings brother

Paul

[Quoted text hidden]





Gordon Watts &lt;gww1210@gmail.com&gt;

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**Paul, this is Gordon, again... Something odd's happening...**


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Gww1210@aol.com <Gww1210@aol.com>  
 To: plshelton@sbcglobal.net  
 Cc: Gww1210@aol.com, gww1210@gmail.com

Thu, May 18, 2017 at 6:56 AM

Paul:

You said something that had me confused earlier: [""But in reality, he gave her POA and she had right to alter deed, even date, "forge" it or sign properly as attorney in fact. That is the judges point."""]

First off, I looked at the POA Richard signed, and it was a 'Limited' POA, limited solely to a sale (not a quit claim deed, or giving away the property for Free without consideration eg payment).

But even aside from that, you were WRONG in your claims that Erika Rhone could forge someone's signature using a POA as authorisation - PROOF:

"When signing contracts on behalf of your principal, sign your own name. After signing your name, print your name then, "As POA for" or "As Agent for" followed by the name of your principal." <http://legalbeagle.com/5154849-sign-power-attomey.html>

"There are some legal regulations and some institutional rules about the "proper" form of signature for an agent empowered by a durable power of attorney. But the overriding legal control is that you must make clear that you are one person who is empowered to sign on behalf of another""as opposed to attempting to forge the signature as wholly your own. The American Bar Association sanctions two ways that an agent can sign. If you are Jane Doe empowered as the agent for Dorothy Doe, for example, you could sign either as: "Dorothy Doe, by Jane Doe under Power of Attorney" or "Jane Doe, attorney-in-fact for Dorothy Doe." Either should pass legal muster for some situations." <https://www.caring.com/questions/how-to-sign-documents-as-power-of-attomey>

"How to Sign as Power of Attorney

When you sign a document as someone's attorney-in-fact, your signature needs to make it clear that you—not they—are signing the document and that you are acting under the authority of a power of attorney." <https://www.legalzoom.com/articles/how-to-sign-a-power-of-attomey-document-for-someone>

"When signing on behalf of a Grantor as Attorney-in-Fact, you should always sign YOUR OWN NAME, followed by the words "Power of Attorney".

Do NOT sign the Grantor's name - EVER!

By signing your own name with the words "Power of Attorney" after your name to any contract or other legal document, the person receiving the documents signed by you on behalf of the person who granted you the Power of Attorney understands exactly what is being provided." <http://www.standardlegal.com/blog/if-i-have-power-of-attomey-how-do-i-sign-legal-documents-on-behalf-of-my-grantor>

\*\* See also pages 13-14 of this 90-page PDF, where Lisa Vitek notarised the July 09, 2006 Warranty Deed that you say Erike Rhone was able to forge. Since you were the one who prepared this document, you are involved somehow. But Ms. Vitek did not notarize it properly (see below), and it

7/6/2017

Gmail - Paul, this is Gordon, again... Something odd's happening...

was not even signed correctly (see above).

## "How do I notarize the signature of someone acting as an attorney in fact?"

An attorney in fact typically signs a document with two names: the attorney in fact's own name and the name of the principal. For example, if John Doe is acting as attorney in fact for Mary Sue, he could sign like this:

"John Doe, attorney in fact for Mary Sue, principal"

Or,

"Mary Sue, by John Doe, attorney in fact"

In this case, John Doe is the person appearing before you and signing the document, but doing so on behalf of Mary Sue. Because John Doe is the only person who is physically present and signing, you would write John Doe's name as the signer in the appropriate parts of the certificate wording (for example, "... personally appeared before me **John Doe**, who acknowledged ..."). "

"" <https://www.nationalnotary.org/notary-bulletin/blog/2015/09/how-to-handle-notarization-attorney-in-fact>

**All this suggests that you could be vulnerable to criminal charges. While I disagree with you on some points, I don't think you're as guilty as what you were portrayed, but when you ignore my suggestion to come clean where I feel you were guilty of small issues (notarising something after the fact), you are shooting yourself in the foot, and reducing the chances you'll get a fair shake. Illinois is corrupt, but not as bad as Florida - my home state - trust me! Take heart and have hope - and do the right thing, whatever it may be.**

Gordon

[Quoted text hidden]



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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
Plaintiff,

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,  
Defendants, and

Gordon Wayne Watts,  
Proposed Intervening Defendant.

) Case No.: 2007 CH 29738

) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge

) Case Type: CONTRACT

) District: First Municipal

) Calendar "W", Courtroom 1912

) **TIME-SENSITIVE:** to be heard,

) in Court Room: 1912, by 07/10/2017

) Court Time: 10:30am (CST)

2017 JUL 10 AM 10:55  
FILED-13  
COURT OF COOK COUNTY ILLINOIS

Notice of Motion

**To:** This Honourable Court and all parties being served (see attached service list, below)  
**From:** Mr. Gordon Wayne Watts, LAKELAND, Fla. (full contact data, below)

**Notice Proper:** Pursuant to Local Rule 2.1 ["Notice of Hearing of Motions"], the undersigned movant is hereby giving this honourable court and all parties proper notice of the attached "MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS," being filed instanter, in the above-captioned case—a copy of which is attached hereto and is being served upon you.

Due to unfamiliarity with this very uncommon "local rule," movant did not give proper "notice" of past motions, via the "notice of motion," in accordance with said local rule, which is peculiar to this court alone. As This Court can see, the attached Motion to Intervene gives overwhelming evidence of Movant's right to claim legal standing to intervene – and that the interests not being represented are **\*\*not\*\*** "de minimus," (unless the court and parties are willing/able to reimburse to Mr. Watts the **full** amount documented herewith, and *then* some for unrecorded costs, time lost from work, and emotional losses).

**Moreover:** The undersigned Intervenor, Gordon Wayne Watts, through human fault, committed three (3) *unintentional* offenses against This Court (and all parties), and, by virtue of this pleading, is offering a sincere apology:

(1) While the undersigned litigant has generally had excellent and professional relations with the many clerks and lawyers involved (*in Chancery, Civil, and Law Divisions, as well as numerous judges' chambers and the chambers of the Chief Judge, as well as the Office of the State Attorney, and the IL Attorney General*), on rare occasion he has expressed human emotion to certain unnamed clerk(s), expressing profound disappointment over the rulings in the various cases regarding defendant, Daniggelis. While this is inexcusable and indefensible, Intervenor, Watts, views Daniggelis as sort-of a grandfather-figure (*whom he feels was cheated out of a house, property, and hundreds of thousands of dollars of equity therewith*), and, all of us being human can understand that if you kick a dog repeatedly (Mr. Watts is comparing *himself* to a dog), the dog will eventually yelp or holler. This does **not** justify the yelping bark, but it is offered up as "mitigating circumstances." Therefore, Mr. Watts offers his sincere apologies for *occasional lapses in professionalism*.

(2) Although Mr. Watts' legal standing to Intervene is very strong (see above—and the attached motion to intervene), he felt an "amicus" brief would be less invasive and more acceptable. While this may be the view of *most* courts, nonetheless, for reasons unknown, case law suggests that Cook County, IL courts take a much dimmer view of *amicus curiae* briefs than they do of, say, Intervention actions. Therefore, Mr. Watts offers his sincere apologies for taking an unintentionally-offensive legal tact, and is hereby changing course to a more accepted and conventional course: that of direct intervention, as provided by statutory and case law.

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(3) As mentioned in the instant "Notice of Motion," Intervenor, Watts, was unfamiliar with this uncommon rule (Local Rule 2.1, requiring a "notice of motion" to accompany motions) which appears unique to Cook County, IL courts—and therefore didn't comply with the rules of the court. **Therefore, pursuant to R.2.1, proper notice is being given of the above-mentioned motion—and an apology herewith is tendered to the court and parties.**

**Details:** Normally, a notice of motion contains a promise for the movant to appear as such-and-such time in such-and-such courtroom to present the motion: "Please take notice that on (certain date) and at (certain time), I shall appear before (named judge) – or any other judge, as may be holding court, in his/her absence – in (certain courtroom) to present (certain motion), which is attached hereto."

The undersigned Movant understands the value and importance of *in propria persona* physical appearance (to be available, for example, to answer any questions in real time, as well as connect name & face). However, physical appearance (as is normally done) is **mathematically impossible**, and yet **Due Process** requires that This Court consider the matter on the merits, so notice is given – *with arguments for an alternative*.

**Problem:** Movant lives in a far, distant locale called "Lakeland, Florida" (which is squarely between Tampa and Orlando, Fla.), and has neither a local attorney retained (to appear on his behalf), nor resources to glibly travel at the drop-of-a-hat whim to Chicago, Illinois (to appear for himself), due to oppressive and ever-present financial constraints.

**Proposed Solution:** This motion should be considered on its merits via written submission to This Court. *In the alternative*, This Court may also (if it so chooses) invoke Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, and/or Rule 206(h)(Remote Electronic Means Depositions), etc., by calling movant at either of his two phone numbers of record: 863-688-9880 (home) and/or 863-409-2109 (cell)

**Arguments Whereof:** It is **very common legal precedent** for motions to be considered in written form only. (In fact, this is probably the most common form, or at least a close second, if not first-place.) *Here are but a few examples:*

(1) Intervenor, Gordon Wayne Watts, filed direct intervention as "next friend" in the Florida Supreme Court on behalf of the late Theresa Marie "Terri" Schindler-Schiavo (see e.g., Exhibit-A). While the court eventually ruled against him in a razor-thin 4-3 split decision (garnering almost 43% of his panel), Mr. Watts' motions, nonetheless, were considered on the merits before the full Supreme Court of his home state, in this high-profile case, and, in fact, his intervention got even farther than that of former Florida Governor, John Ellis "Jeb" Bush, who filed similar intervention on behalf of Ms. Schiavo (Bush lost 7-0), or even Schiavo's blood family (who got only about 33% of their panel in Federal Court).

Watts lost 4-3 on rehearing. Bush lost 7-0 on rehearing – before the same panel, and on the same issue. (Apparently, the court liked Watts' "food/water" arguments better than the similar, but inferior "feeding tube" arguments presented by both Gov. Jeb Bush and Schiavo's parents.) Although Watts occasionally visited The Florida Supreme Court in person while he was a student at The Florida State University (in Tallahassee, Fla.), he never appeared in person to present his motions for intervention in the infamous "Terri Schiavo" case, and yet **The Court still considered the matter on the merits.** (See Exhibit-A)

(2) Subsequently, Mr. Watts decided to file an *Amicus Curiae* (a friend of the court brief) in one of the recent "Gay Marriage" cases pending before the Federal Appeals court in his circuit. In fact, he even went as far as to ask The Court for leave to amend 'out of time' (a rare procedure to allow a litigant to amend a brief, even though filing deadlines have passed, to correct errors and/or to add additional material, facts, arguments, etc.). It is believed that Watts was the only non-Lawyer litigant allowed participation in this case. (In fact, Watts was

permitted to amend his initial brief, out of time, even though another *pro se* non-Lawyer was denied: Ex-B) In any event, although Mr. Watts did not present, “in person,” his motion for leave to file an *amicus* brief, nor the *amicus* brief itself, by traveling to The U.S. 11<sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, GA, nonetheless, the court considered his brief and all related motions on the merits. (See, e.g., Exhibit-B)

**(3) Let us also consider the case of an imprisoned Illinois prisoner – in some state or county jail: many a “jailhouse lawyer” exists in our correctional institution's incarcerated population. They file all kinds of frivolous lawsuits, motions, and torts! While most of them end up in “file-13” of that great wastebasket of the Judicial System, nonetheless, state and federal Due Process requires these motions be considered on the merits. While the undersigned litigant has no “expert” knowledge of The State of Illinois court system, it goes without saying that not all prisoners are carted “back and forth” to the court for numerous frivolous motions (for very obvious cost-restraint reasons—in fact, Illinois is currently facing a financial crisis!). These prisoners, many of whom do not appear in person to present their motions, nonetheless, get “their day in court”: They don't appear in person, and yet their motions are still considered on the merits!**

**(4) Perhaps, the best argument for consideration of a motion, where the litigant can't travel to The Court in person to present it, comes from This Court itself! (And would, thus, be legally-binding case-law precedent.)**

Looking at GMAC MORTGAGE LLC, et al. v. RICHARD DANIGGELIS, et al. (case number: 2007-CH-29738), which was heard before the Chancery Division of the Cook County, IL circuit court (not to be confused with a case heard in the Law Division, and by the same style and case number, which was subsequently transferred from Chancery to Law), we see a spirited fight put up for justice in this case, by no less than Mr. Watts, himself: As but one example of a motion considered without litigant appearing in person, we find from the docket in the above-mentioned case, on 11/30/2015, Watts moved for rehearing (without appearing in person), and on 12/07/2015, The Court (Hon. Michael F. Otto, associate judge, presiding in this case) ruled, in courtroom 2804, in a ruling titled: “MISCELLANEOUS MOTION – ALLOWED.” While Judge Otto commits a tort of slander on page 3 of his Dec. 07, 2015 ruling<sup>1</sup>, nonetheless, he does rule on the merits of Watts request to Supplement the Record on Appeal (in the appeal that was pending at that time).

Although the undersigned movant would argue that rulings made by Hon. Judge Michael F. Otto (Associate Judge, #2605) were exceptionally incorrect (as a matter of case law, statutory law, and State & Federal constitutional rights), as applied to the facts of that case, nonetheless, Judge Otto finally (after much prodding and begging) considered the motions on the merits—and issued a ruling (right or wrong), not just once, but several times. (Judge Otto should be commended for an “A+” performance of granting “Procedural Due Process,” even if “Substantive Due Process” was trampled upon by what movant argues were “unjust” rulings.)

Therefore, even This Court's own legally-binding precedent confirms that State and Federal Due Process require all redresses, grievances, suits at law, and related motions to be heard on the merits—whether *or not* litigants seeking redress can physically travel to The Court *in propria persona*: **The Court does not discriminate nor deny due process to litigants simply for being “too poor” to afford to hire a lawyer to appear—or to travel to appear themselves. Discrimination is wrong—in any of its forms or manifestations.**

<sup>1</sup> *Falsely claiming that Watts is arguing that vexatious litigants practices are 'OK'—direct quote: “The argument that all strangers to a case should be allowed to engage in the tactics of a vexatious litigant is so unpersuasive as to require no further discussion.”—Watts **\*\*never\*\*** said such things within the “4 Corners” of any of his briefs, arguing only that if vexatious litigants be given a fair hearing, then he should be heard & treated fairly too. Thus judge's statement/claims was false, and slanderous, but we're all human, and make mistakes—and this argument & documentation of slander/libel is **\*\*not\*\*** meant as disrespectful of the judge or the court.*

**Prayer(s) for Relief:** Therefore, please review and rule on my motion for intervention, filed *instantly*, granting speedy relief to effect justice for both Defendant, Mr. Daniggelis, as well as Intervenor, Mr. Watts.

Arguments defending this position are on docket, as This Court has been good enough to grant extensive **Procedural Due Process** and document (by docketing) the sworn affidavit and arguments of the undersigned Intervenor—in prior filings he has submitted within the last several years to the Chancery, Civil, and Law Divisions of the Cook County, IL circuit/trial courts.

While a “CASE SET ON TRIAL CALL” [whether “bench trial” or a “trial by jury”] might theoretically grant justice, this is passing the buck; and, as The Court created this problem (by transferring title without legal justification—a brute show of force, and no more), therefore the court, which created the problem should decline to “pass the buck” to a “trial call,” and, instead, solve that problem which it, *itself*, created. Now, I pray This Court speedily grant speedy **Substantive Due Process** on any & all claims of Redress which I've previously made—and which were made by Defendant, Mr. Richard B. Daniggelis.

I realise that I'm effectively asking for a “Summary Judgment,” which is addressed and circumscribed by Local Rule 2.1(f) (“Filing motions for summary judgment in the Law Division”). This sub-section states *en toto*: “All motions for summary judgement shall be filed and duly noticed for hearing such that the motion comes before the court for initial presentation and entry of a briefing schedule not later than forty-five (45) days before the trial date, ***except by prior leave of court and for good cause shown*** or unless a deadline for dispositive motions is otherwise specified in the case management order.” [Emphasis added for clarity; not in original]

**Here is 'Good Cause':** Since the nature and magnitude of the injustices are egregious, and since the court and parties have all had very ample opportunities to hash out their arguments, it would prejudice no one should the court issue an order of show cause to Mr. Younes as to why title should not transfer back to its rightful owner—or (simpler & better yet), should the court issue a summary judgment as a matter of law—in favour of Daniggelis. **To decline to issue a summary judgment would fulfill the prophecy: “Justice delayed = Justice denied.”**

**Specifically,** This Court is asked to return title of 1720 N. Sedgwick St. to its rightful owner, Richard B. Daniggelis (and award damages as it sees fit for his numerous losses—not the least of which is the fact that he's losing huge amounts of monies paid out-of-pocket for storage of his belongings, as well, possibly, as rent to procure a replacement housing—so that he does not have to live on the streets or in his van—as was reported widely, in the recent past), unless The Court can offer an excellent, detailed, and coherent explanation to the contrary. [Note: While Judge Otto made valiant efforts to argue against justice here, none of his legal arguments were sound or persuasive, excepting the one pointing out that the trial courts had temporarily lost jurisdiction when the matter was on appeal. The mandate has issued, and that appeal is finalised, so no longer will that dog hunt: The trial court is responsible for cleaning up its own messes.] **Respectfully: If This Court disagrees with the legal arguments herewith, I hereby move The Court – and all of its judges – to grant a motion for clarification to the contrary. Barring that, relief is sought as previously requested.**

This Court may also (if it so chooses) invoke Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, and/or Rule 206(h)(Remote Electronic Means Depositions), etc., by calling movant at either of his two phone numbers of record: 863-688-9880 (home) and/or 863-409-2109 (cell).

**Dated: This Thursday, July 06, 2017**

**Page 4 of 6, Notice of Motion, by Intervenor, Gordon Wayne Watts**

**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

The undersigned Movant, Gordon Wayne Watts, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "Notice of Motion," and its exhibits were delivered to the following parties as indicated – this Thursday, the 6th day of July, 2017:

**LAW DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801  
Law@CookCountyCourt.com ; (312) 603-6930 ; (312) 603-5426  
Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

**Hon. Diane M. Shelley, Circuit Judge, Law Division:**

[Note: I may, for the convenience of the new judge, who replaces Judge Sanjay T. Tailor, include a few hard copies of old filings, but shall not serve them upon other parties, as I've already served them properly.] ;

ccc.LawCalendarW@CookcountyIL.gov

(312) 603-5940, (312) 603Diane.Shelley@CookCountyIL.gov-7551, (312) 603-4811

Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

**Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)**

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Email: AndjelkoGalic@Hotmail.com ; AGForeclosureDefense@Gmail.com

134 N. LaSalle St., STE 1040, CHICAGO IL, 60602

(Note: The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)

**Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.), Email: RIndyke@SBCGlobal.net**

221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

**Mr. Robert J. More (Anselm45@Gmail.com)** I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

**Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

http://www.KingHolloway.com/contact.htm ; Attn: Peter M. King, Esq. PKing@khl-law.com

or: PKing@KingHolloway.com ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

(Note: Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.) I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

**Paul L. Shelton, Esq.**

E-mail: PMSA136@aol.com ; PLShelton@SBCGlobal.net As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

\* **Joseph Younes Law Offices / http://ChicagoAccidentAttorney.net** (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122 ; Fax: (312) 372-1408. Email is (or was?) RoJoe69@yahoo.com per http://www.ZoomInfo.com/p/JosephYounes/599467626 Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., **EXHIBIT-C** in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr.

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Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: Younes' attorney Hugh Howard, c/o: Law Offices of Hugh D. Howard, 166 W Washington St, Suite 600, Chicago, IL 60602, Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: http://www.HughDHowardLaw.com

**MERS (Mortgage Electronic Registration Systems, Inc.)**

<https://www.mersinc.org/about-us/about-us>

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: [JanisS@mersinc.org](mailto:JanisS@mersinc.org)

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

[SandraT@mersinc.org](mailto:SandraT@mersinc.org) – Director, Corporate Communications

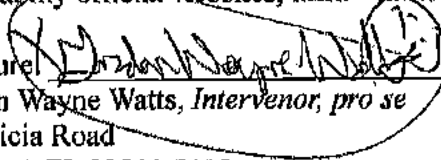
Note: MERS is only being served electronically per above.

I, **Gordon Wayne Watts**, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "Notice of Motion," and its exhibits, were served upon all parties listed above, this 6th day of July, 2017 by the following methods:

• United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

• E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

• Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official-websites, infra-- linked at the "Mortgage Fraud" story, dated, Fri. 14 Apr. 2017.

Signature  Date Thurs 06 July 2017

Gordon Wayne Watts, *Intervenor, pro se*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880 (home) or: (863) 409-2109 (cell)

Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

Date: Thursday, 06 July 2017



## INDEX TO THE EXHIBITS

### Instrument

### Docket/Tab#

Case law citations to the "Terri Schiavo"  
(aka: the Florida 'feeding tube girl') case

Exhibit-A

Court ruling & docketing information in the recent  
"Gay Marriage" case, heard before the U.S. 11<sup>th</sup> Circuit  
FEDERAL Court of Appeals, in Atlanta, Georgia

Exhibit-B

FedEx package refused by Atty. Joseph Younes

Exhibit-C

C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)

C-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

Case law citations to the "Terri Schiavo"  
(aka: the Florida 'feeding tube girl') case

Exhibit-A

\* *In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)*, No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)  
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

\* *In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO, GUARDIAN: THERESA SCHIAVO*, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing. (Bush got 0.0% of his panel before the same court)  
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

\* *Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo*, 403 F.3d 1223, 2005 WL 648897 (11<sup>th</sup> Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of their panel on the Federal Appeals level)  
<http://Media.ca11.UsCourts.gov/opinions/pub/files/200511556.pdf>

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**Court ruling & docketing information in the recent "Gay Marriage" case, heard before  
the U.S. 11<sup>th</sup> Circuit FEDERAL Court of Appeals, in Atlanta, Georgia Exhibit-B (1<sup>st</sup> of 3 pages)**

**[January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne  
Watts' (Pro Se) motion for leave to file an amended *Amicus Curiae* brief and denying Mr. Anthony Clare  
Citro's (Pro Se) motions for leave to file out of time and for leave to file as *Amicus Curiae*]**

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 2

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

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No. 14-14061-AA

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**JAMES DOMER BRENNER, *et al.***

**Plaintiffs-Appellees,**

**versus**

**JOHN H. ARMSTRONG, *et al.***

**Defendants-Appellants.**

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No. 14-14066-AA

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**SLOAN GRIMSLEY, *et al.***

**Plaintiffs-Appellees,**

**versus**

**JOHN H. ARMSTRONG, *et al.***

**Defendants-Appellants.**

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**Appeals from the United States District Court  
for the Northern District of Florida**

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Case: 14-14061 Date Filed: 01/06/2015 Page: 2 of 2

ORDER:

Clare Anthony Citro's motions for leave to file out of time and for leave to file a brief as *amicus curiae* are DENIED.

Gordon Wayne Watts's motion for leave to file an amended *amicus curiae* brief is GRANTED.

  
UNITED STATES CIRCUIT JUDGE

Case: 14-14061 Date Filed: 01/06/2015 Page: 1 of 1

**UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING  
56 Forsyth Street, N.W.  
Atlanta, Georgia 30303

John Ley  
Clerk of Court

For rules and forms visit  
[www.call.uscourts.gov](http://www.call.uscourts.gov)

January 06, 2015

Anthony Citro  
254 SW 7TH ST  
DANIA, FL 33004-3948

Gordon Wayne Watts  
821 ALICIA RD  
LAKELAND, FL 33801-2113

Appeal Number: 14-14061-AA ; 14-14066 -AA  
Case Style: James Brenner, et al v. John Armstrong, et al  
District Court Docket No: 4:14-cv-00107-RH-CAS

**This Court requires all counsel to file documents electronically using the Electronic Case Files ("ECF") system, unless exempted for good cause.**

The enclosed order has been ENTERED.

Sincerely,

JOHN LEY, Clerk of Court

Reply to: David L. Thomas, AA/rvg  
Phone #: (404) 335-6169

MOT-2 Notice of Court Action

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**FedEx package refused by Atty. Joseph Younes** **Exhibit-C**  
**C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)**



April 26, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number 7862-7122-6226.

---

**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivery location:</b>	821 ALICIA RD Lakeland, FL 33801
<b>Signed for by:</b>	Signature not required	<b>Delivery date:</b>	Apr 26, 2017 09:53
<b>Service type:</b>	FedEx Ground		
<b>Special Handling:</b>			

**NO SIGNATURE REQUIRED**

Proof-of-delivery details appear below; however, no signature is available for this FedEx Ground shipment because a signature was not required.

---

**Shipping Information:**

<b>Tracking number:</b>	7862-7122-6226	<b>Ship date:</b>	Apr 18, 2017
		<b>Weight:</b>	1.8 lbs/0.8 kg

**Recipient:**  
JOSEPH YOUNES LAW OFFICES  
JOSEPH YOUNES LAW OFFICES  
166 W WASHINGTON ST  
STE 600  
CHICAGO, IL 60602 US

**Shipper:**  
gordan watts  
gordan watts  
821 ALICIA RD  
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

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Reminder: AOL will never ask you for your password or billing information.

Show images & enable links

Subject: FedEx Shipment 786271226226 Delivery Exception

Date: 4/21/2017 10:24:49 P.M. Eastern Daylight Time

From: TrackingUpdates@fedex.com

Reply To: trackingmail@fedex.com

To: j.younes1210@psd.com

Sent from the Internet (Details)

### Tracking # 786271226226

Ship date:

Tue, 4/18/2017

Scheduled delivery:

Mon, 4/24/2017 by end of day

Delivery exception

### Shipment Facts

FedEx attempted, but was unable to complete delivery of the following shipment:

Tracking number:	786271226226
Status:	Delivery exception
Service type:	FedEx Ground
Packaging type:	Package
Number of pieces:	1
Weight:	0.70 lb.
Standard transit:	4/21/2017

### Resolving Delivery Issues

The reason delivery was not completed is outlined below. Where applicable, resolution recommendations are also provided.

Exception Reason	Recommended Action
1. Refused by recipient - Not ordered	No action is required. The package is being returned to the shipper.
2. Shipment Refused by Recipient	No action is required. The package is being returned to the shipper.

FedEx package refused by Atty. Joseph Younes

Exhibit-C

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)

**FedEx RETURN TO SHIP**  
 Dear Customer - This package is being returned because:

Delivery refused by: Joe  
 Because:

Incorrect delivery address/recipient unknown/Closed.  
 Damaged. An inspection report has been completed.  
 The entire contents of the package are enclosed.  
 Damaged contents were discarded. The balance is enclosed.  
 Package is greater than the maximum size/weight allowed.  
 Delivery attempts unsuccessful/unable to reach recipient for alternate delivery instructions.  
 Improper HazMat packaging/labeling/documentation.  
 ATTN: FedEx Personnel: Attach the OP-909 & SF-136 to all HazMat.  
 Other:

Package received on trailer from shipper:  
 Crushed  Wet  Oversize  
 Open  Inadequate Packaging  Overweight

5-5716, per website  
 Joseph Younes/599-167626

4-21-17

STATION

SEEN BY

SIGNATURE

RETURN STATE  
 TO FL

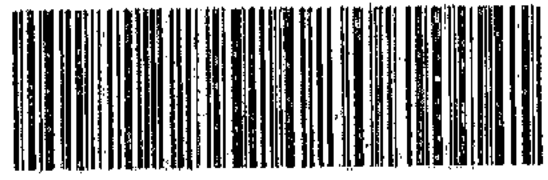
RETURN ZIP  
 TO 33807

7862 7122 6226

4-21-17

60602

9822 0477 3 (000 000 0000) 0 00 7862 7122 6226



Joseph Younes Law Offices  
 166 W. WASHINGTON ST.  
 Phone: (312) 372-1122; Fax  
 Email is (or was?) No Joe69



220-1580

60602-4317-09

JOSEPH YOUNES LAW OFFICES  
 166 WASHINGTON ST  
 CHICAGO, IL

SHIP/LABEL REV 03/10 - RUN 1/2017

FACILITY:

NLP:

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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - LAW DIVISION**

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.  
aka: "LaSalle Bank National Association," aka "US Bank,  
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,  
**Plaintiff,**

vs.

Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, *et al.*,  
**Defendants, and:**

Gordon Wayne Watts,  
**Proposed Intervening Defendant.**

) **Case No.: 2007 CH 29738**

) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge

) Case Type: CONTRACT  
) District: First Municipal  
) Calendar "W", Courtroom 1912

) **TIME-SENSITIVE:** to be heard  
) in Court Room: 1912, by 07/10/2017  
) Court Time: 10:30am (CST)

FILED-19  
2017 JUL 7 11:55  
CIRCUIT COURT  
COOK COUNTY, ILLINOIS

**MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS**

Gordon Wayne Watts ("Intervenor") hereby moves this Court, pursuant to 735 ILCS 5/2-408, for permission to intervene in the above-captioned matter, or in the Alternative, for leave to file an *amicus curiae* brief, and for the previously-filed notice, and *this* instant notice/motion (and attached sworn Affidavit), to be deemed to be converted to and constitute said *amicus* brief.

1. The *Amicus* brief (containing exhibits & additional facts of interest regarding defendant Younes' behaviour and actions) which proposed Intervenor, Watts, filed with this Court on 04/17/2017, was timely docketed on 04/21/2017, and properly acknowledged as a *pro se* filing by the undersigned *Intervenor*.

2. Mr. Richard B. Daniggelis, the true owner, who lost his house (1720 N. Sedgwick St., Old Town, Chicago, IL) through a forged signature in a mortgage fraud scheme (and which fraud tort is still being actively litigated and investigated in several forums, some Judicial and some Executive), was, on occasion, allowed to speak in court, in order that he might get Due Process for his mistreatment. The undersigned Intervenor is in communication with Daniggelis, and he asserts that Daniggelis informed Watts that he (Daniggelis) desires to communicate with the court, but is unable (because he lacks the legal know-how to do so), and his attorney is not at all helpful in this regard.

3. Intervenor, Gordon Wayne Watts, has done much research and work (see Appendix, *infra*) for Mr. Daniggelis, the latter of whom has indicted his desire to pay Watts for research & shipping services rendered.

4. Mr. Watts has the right to intervene under 735 ILCS 5/2-408(a)(2) because "the representation of the applicant's interest by existing parties is or may be inadequate and the applicant will or may be bound by an order or judgment in the action."

5. Moreover, Watts has the right to intervene under 735 ILCS 5/2-408(a)(3) because "the applicant is so situated as to be adversely affected by a distribution or other disposition of property in the custody or subject to the control or disposition of the court or a court officer."

6. This Motion is timely: Although courts evaluating timeliness consider "the totality of the circumstances," *United States v. Alcan Aluminum, Inc.*, 25 F.3d 1174, 1181 (3d Cir. 1994), "[p]rejudice is the heart of the timeliness requirement," *Jones v. Caddo Parish Sch. Bd.*, 735 F.2d 923, 946 (5<sup>th</sup> Cir. 1984) (*en*

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*banc*). Indeed, "courts are in general agreement that an intervention of right under Rule 24(a) must be granted unless the petition to intervene would work a hardship on one of the original parties." *McDonald v. E.J. Lavino Co.*, 430 F.2d 1065, 1073 (5th Cir. 1970) (citation omitted). Since the court—and all parties—have long known the legal arguments and views of Intervenor (alho he merely asserted such arguments in *amici curiae* briefs—which this court is not required to grant), no party is prejudiced or caught off guard.

### MEMORANDUM OF LAW:

#### **PETITIONER IS ENTITLED TO INTERVENE AS A MATTER OF RIGHT.**

Intervenor, Gordon Wayne Watts, has "unique knowledge" (backed up by a Sworn and Notarised AFFIDAVIT, as well as supported by facts and documented sources, not the least of the which is *DNAinfo*, a local newspaper, *and unique information garnered from Daniggelis, himself, but which he can not convey to the court due to limited legal knowledge*). Since his knowledge of the case is 'unique' and presents additional facts *and* additional legal arguments, by definition, the other parties are not representing said 'unique' facts *and* arguments, and therefore "the representation of the applicant's interest by existing parties is or may be inadequate," giving Watts the right to intervene under 735 ILCS 5/2-408(a)(2).

Moreover, Intervenor, Gordon Wayne Watts, has a sufficient interest in this case that warrants intervention as of right because the theft of Daniggelis' house forced him to begin using expensive storage facilities (for his belongings), made him homeless (or forced him to move in with some Good Samaritan), and all this costs a great deal of monies. The prior illegal construction/demolition that was Defendant Younes was documented to have performed on this house (see prior Watts filing), and the more-current illegal work, greatly in excess of City of Chicago Building Codes (which was the proximal cause of the above-captioned lawsuit by the City against Younes) caused **both financial and emotional harm to Daniggelis**. Moreover, the potential illegal destruction of the Sedgwick house (in this Historic District) would 'moot' any pending litigation and/or investigation into the illegal transfer of title.

The court's potential to allow illegal destruction of this historic-district house would make it infinitesimally more difficult for Daniggelis to pay back Watts (due to the additional financial and emotional burden so-placed upon him.) Therefore, Watts is "so situated as to be adversely affected by a distribution or other disposition of property in the custody or subject to the control or disposition of the court or a court officer," giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).

Where intervention as of right is asserted, "the trial court's jurisdiction is limited to determining **timeliness, inadequacy of representation and sufficiency of interest**; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted." *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1<sup>st</sup> Dist. 1984). [Emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).

#### Newly-discovered facts of a dispositive nature

This Court knows that defendant, Joseph Younes, has denied ever planning or conspiring to break the law in regards to executing 'excessive' work, beyond the permits. However, *DNAinfo* reported that a local attorney, who has no motives to be sued for slander, libel, or defamation of character, said quite the opposite:

"Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we

have some mixed signals from the owner, but his actions speak clearly about his intent for the building.”  
[Source: “‘Rotted’ Historic Building In Old Town Triangle Could Be Seized By City,” by Ted Cox, *DNAinfo*,  
March 30, 2017: <https://www.DNAinfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city> ] See also **EXHIBIT-A** in the instant filing. [Watts, who knew of this news item right after it published, on 3-30-2017, did not include it in his last filing, dated 4-22-2017, because he was struggling to file it in time for Judge Ball-Reed to get it before the 4-27-2017 hearing. Watts, by virtue of this statement, issues a sincere apology for his oversight & slowness here.]

**Newly-discovered Eyewitness Testimony of a dispositive nature**

Watts, when speaking recently by phone with Daniggelis, was told three (3) key facts about the condition of the house at 1720 N. Sedgwick, in the case at bar, which have not made it to the “ears of the court” due to the lack of legal mojo on the part of Mr. Daniggelis:

- 1) Daniggelis, who used to help his father build houses (and is an expert) told Watts that his father, when building the house, laid a foundation which is strong enough for a five (5) story house, even though the house at 1720 is only a 2-story house. This fact is relevant because Younes has repeatedly told This Court that the foundation was 'bad.' – I (the undersigned Watts) do not expect This Court to merely take my word (as this is but hearsay). However, I include this testimony from Daniggelis because it can be “helpful guidance” to This Court when asking CR Realty (and other experts in the field) to look with more-exact accuracy about the foundation. [This claim can, thus, be 'tested' by realty & building experts looking for certain things—and potentially save much money if the foundation does not need tearing up & removal/replacement.]
- 2) Daniggelis also said that when the City of Chicago was in civil court against him, recently, for building code violations, one inspector, who looked at the roof, was only able to complain that one piece of wood was turned around “backwards,” so that the label was facing the wrong way. I include this because Younes claimed that the roof have major 'leaks,' and Daniggelis, if This Court can get him to testify (and get prior City code inspectors to testify), can determine whether there were 'major' leaks (like Younes claims) or, rather, an occasional, minor leak (like Daniggelis and others apparently claim).
- 3) Daniggelis said that he was concerned that removing the roof and/or floors would make the house more unstable and susceptible to torque damage from the wind. While he could not determine the extent of the damage Younes inflicted upon the house (since he was not permitted access), I enter this into the record so that inspectors can be on the lookout for this potential danger.
- 4) I include these 3 points, supra, and the DNAinfo quote to call into question Younes' honesty, which is dispositive to This Court's dealings with him.

**NOTE:** While I am very disgusted with the dishonesty and recklessness which Mr. Younes has exhibited (in both code violations as well as knowingly participating in a fraud—and benefiting from it by the illicit gains of getting a house for free – without any documented payment to Daniggelis), nonetheless, I do not wish any ill or harm upon Younes, nor do I seek revenge. [In fact, in my prior sworn affidavits, I was careful to include the fact that Younes gave Daniggelis some assistance moving out by allowing his employees to help move things; moreover, while 'religion' is not germane to the matter before This Court, I was careful to recall—and attest—to how Daniggelis told me that he and Younes occasionally had conversations about religion, and both men were respectful to one another, in spite of the fact that they are members of two totally-different religions. This, of course, tells us that Younes is not totally evil, and, I hope, assures This Court that while I (the undersigned) am human, my motives are for the good.

**Work done for Daniggelis**

Mr. Daniggelis asked the undersigned Intervenor for assistance on a number of matters, including, but not limited to searching for, obtaining, and pass along many records (some court records, some publicly-accessible

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Internet records), sending them to him, and/or assistance on several unspecified technological/computer-related issues. [See also **EXHIBIT-B** in the instant filing.] If this court would be deny the instant motion, I would respectfully ask: how I might expect to get paid if Daniggelis is getting beaten up in court (house stolen from him, and then illegally destroyed –in violation of Landmark and City CODES), and my interests (to getting Daniggelis being able to avoid burdensome financial weights, that would severely restrict him) are not represented? As a side-note, This Court takes a dim view of elder abuse, and Intervenor's INTERVENTION is of assistance to This Court's desire to have all tools handy to do justice.

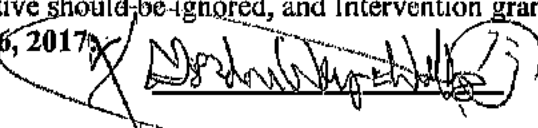
***Here are the details of the work done, as shown in the Exhibits:***

Where intervention as of right is asserted, “the trial court’s jurisdiction is limited to determining **[[#1]] timeliness, [[#2]] inadequacy of representation** and **[[#3]] sufficiency of interest**; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted.” ***City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1<sup>st</sup> Dist. 1984).** [Enumeration and emphasis added in underline & bold; not in original] Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3). [#1] This is timely; [#2] I doubt that anyone would doubt that the many new points Intervenor raises lack representation, as they are key facts that have not been addressed before, and this case could tip either way depending on my submitting (or not submitting) these key facts. However, is prong #3 satisfied?

Looking at the great financial costs Intervenor has incurred, we don't even count his own litigation (printing, service costs, and the huge time lost from working a better-paying job). But, looking solely at the FOIA and other misc. research Intervenor did for Daniggelis, and for which Daniggelis indicated he wished to pay, we see the following: \$104.68 + \$10.21 + \$21.19 + \$11.50 + \$33.19 + \$2.25 + \$13.28 + \$20.64 + \$9.60 + \$76.25 + \$6.47 + \$3.95 + \$8.88 + labour + time lost from work. This suggest that Intervenor has spent at least \$322.09, not counting huge time lost from work, gas & upkeep for his vehicle, food costs, etc. (And, were we to count the legal filings, and not just the research, estimating what a 'real' lawyer would charge to file supportive briefs – Intervenor is not a lawyer – this would drive up the costs to triple or more, since US Postal and FedEx service don't run on fairy dust.) Based on the foregoing, Intervenor has a huge interest. But – there is one more interest: Daniggelis is like a grandfather to him, and the pain he's suffered inflicts emotional harm upon Watts, in the same way were it to happen to anyone else's mother, father, uncle, grandfather, etc. Were Watts his biological kin, say, a son or daughter, Intervention solely based on emotional pain would not be questioned. #3: Lastly, Watts meets the third prong, sufficiency of interest, and should be permitted to intervene.

Of course, should the court decline to grant intervention as of right, Watts; filings might be deemed *amicus curiae*, with the good-will intentions to help the court. Indeed, ***Kinkel v. Cingular Wireless, L.L.C.*, 223 Ill. 2D 1; 857 N.E.2d 250; 306 Ill.Dec. 157 (Jan. 11, 2006)**, holds that an *Amicus* needs merely offer helpful information that the parties have overlooked. Illinois Courts also adopt a 7th Cir. Federal Court standard in which((#1)) a party is not represented at all; ((#2)) the 'direct interest' test; or, ((#3)) the same test as above: Helpful info overlooked by the parties. NOTE: The 7th Circuit test uses the key operator “or,” meaning that any one “or” the other of the three tests need apply. See e.g., ***NOW, et al. v. Scheidler, et al.*, (Nos. 99-3076, 99-3336, 99-3891 & 99-3892, 7th. Cir., Opinion July 31, 2000.** But, it would appear the *amici* are disfavoured in Illinois thru some unspoken rule, so maybe this alternative should-be-ignored, and Intervention granted.

Respectfully submitted this Thursday, July 06, 2017



**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

The undersigned Movant, **Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “Motion to Intervene,” and its exhibits were delivered to the following parties as indicated – this Thursday, the 6th day of July, 2017:

**LAW DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801  
Law@CookCountyCourt.com ; (312) 603-6930 ; (312) 603-5426  
Chicago, IL 60602 – , Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**Hon. Diane M. Shelley, Circuit Judge, Law Division:**

[Note: I may, for the convenience of the new judge, who replaces Judge Sanjay T. Tailor, include a few hard copies of old filings, but shall not serve them upon other parties, as I've already served them properly.] ;  
ccc.LawCalendarW@CookcountyIL.gov  
(312) 603-5940, (312) 603Diane.Shelley@CookCountyIL.gov-7551, (312) 603-4811  
Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602

**Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)**

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)  
Email: AndjelkoGalic@Hotmail.com ; AGForeclosureDefense@Gmail.com  
134 N. LaSalle St., STE 1040, CHICAGO IL, 60602  
(Note: The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)

**Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.), Email: RIndyke@SBCGlobal.net**  
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

**Mr. Robert J. More (Anselm45@Gmail.com)** I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

**Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. PKing@khl-law.com  
or: PKing@KingHolloway.com ; One North LaSalle Street, Suite 3040, Chicago, IL 60602  
(Note: Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.) I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

**Paul L. Shelton, Esq.**

E-mail: PMSA136@aol.com ; PLShelton@SBCGlobal.net As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

\* **Joseph Younes Law Offices** / <http://ChicagoAccidentAttorney.net> (312)635-5716, per website: 166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122 ; Fax: (312) 372-1408. Email is (or was?) [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) per <http://www.ZoomInfo.com/p/JosephYounes/599467626> Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., **EXHIBIT-C** in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr.

Younes & other litigants), and send me a nominal bill for said service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: Younes' attorney **Hugh Howard, c/o: Law Offices of Hugh D. Howard, 166 W Washington St, Suite 600, Chicago, Il 60602, Phone | 312-781-1002, Email | [Hugh@HughDHowardLaw.com](mailto:Hugh@HughDHowardLaw.com), per: <http://www.HughDHowardLaw.com>**

**MERS (Mortgage Electronic Registration Systems, Inc.)**

<https://www.mersinc.org/about-us/about-us>

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: JanisS@mersinc.org

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

SandraT@mersinc.org – Director, Corporate Communications

Note: MERS is only being served electronically per above.

I, **Gordon Wayne Watts, the undersigned**, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above “Motion to Intervene,” and its exhibits, were served upon all parties listed above, this 6th day of July, 2017 by the following methods:

- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

- E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

- Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, infra-- linked at the “Mortgage Fraud” story, dated, Fri. 14 Apr. 2017.

Signature:  Date: Thu 06 July 2017

Gordon Wayne Watts, *Intervenor, pro se*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880 (home) or: (863) 409-2109 (cell)

Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

Date: **Thursday, 06 July 2017**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

## INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
<b>DNAinfo news item (screenshot)</b>	<b>Exhibit-A</b>
<b>A-1 (news item title)</b> <b>A-2 (section quoting Jordan Matyas, who <i>effectively</i> calls Younes a liar)</b>	
<b>Work done for Daniggelis</b>	<b>Exhibit-B</b>
<b>FOIA research (Freedom of Information Act requests for public records—and other services)</b>	
<b>B-1 (FOIA - 07/16/2015 grant of various Clerk of the Court, Cook Cty, IL, records)</b>	
<b>B-2 (FOIA - 07/24/2015 bill of \$104.68 to CHANCERY Division, Cook Cty, IL, records)</b>	
<b>B-3 (FOIA - 07/24/2015 bill of \$102.50, with date-stamp; Showing the \$104.68 before fees)</b>	
<b>B-4 (FOIA - 07/31/2015 bill of \$10.00, before fees; Showing \$10.21 after transaction fee)</b>	
<b>B-5 (FOIA - record: Credit Card statement, cover sheet, closing on 07/17/2015)</b>	
<b>B-6 (FOIA - 07/16/2015, Credit Card bill for \$21.19 Cook County, IL court records)</b>	
<b>B-7 (FOIA - 09/10/2015: \$11.50, Ship to Daniggelis via USPS)</b>	
<b>B-8 (FOIA - 12/03/2015: bill of \$33.19 to LAW Division, Cook Cty, IL, records)</b>	
<b>B-9 (FOIA - 01/13/2015: bill of \$2.25 to LAW Division, Cook Cty, IL, records)</b>	
<b>B-10 (FOIA - 01/21/2015: bill of \$13.28 to CIVIL, 1<sup>st</sup> Municipal Division, Cook Cty, IL, records)</b>	
<b>B-11 (AxiomBanking 05/17/2016 ship FOIA research via UPS to Daniggelis, \$20.64; (AxiomBanking 05/26/2016 pay for FOIA research printouts to UPS to Daniggelis, \$9.60)</b>	
<b>B-12 (FOIA 07/01/2016: FOIA Request from First Appellate Court, IL, acknowledging \$76.25 in fees)</b>	
<b>B-13 (FOIA 07/01/2016: FOIA costs: \$76.25 money order; \$6.47 mailing; \$3.95 lunch break)</b>	
<b>B-14 (FOIA replies of 06/03/2016 and 04/07/2017 from City of Chicago, Building Dept. Cost: TIME)</b>	
<b>B-15 (FOIA reply of 06/07/2016 from City of Chicago, POLICE Department. Cost: TIME)</b>	
<b>B-16 (FedEx shipping receipt to send FOIA research to Daniggelis: 09/15/2015, est. cost \$8.88 + labor)</b>	
<b>B-17 (FOIA replies of May 18, May 25, June 1, June 8, 2016 from IL Office of Atty Gen; Cost: TIME)</b>	
<b>B-18 (FOIA reply of 04/12/2017 from City of Chicago DPD e.g., Landmarks; Cost: TIME)</b>	
<b>FedEx package refused by Atty. Joseph Younes</b>	<b>Exhibit-C</b>
<b>C-1 (FedEx proof of Service to Defendant, Joseph Younes, Esq.: April 18, 2017)</b>	
<b>C-2 (AOL email dated April 21, 2017 from FedEx showing Defendant, Younes, refused court service)</b>	
<b>C-3 (Returned FedEx service copy of briefs to Atty. Joseph Younes, Esq., dated April 21, 2017)</b>	

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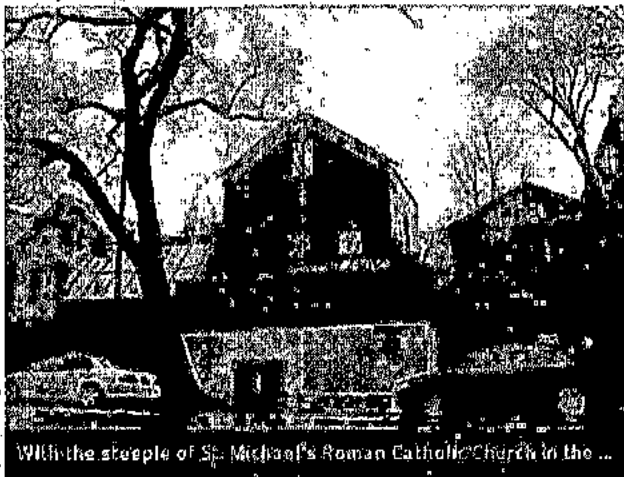
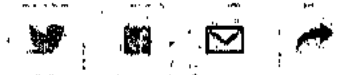
chicago
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LINCOLN PARK & OLD TOWN Politics Real Estate

# 'Rotted' Historic Building In Old Town Triangle Could Be Seized By City



By Ted Coz | March 30, 2017 5:00pm  
 | Updated on March 30, 2017 10:43pm  
 @tedcozchicago



With the steeple of St. Michael's Roman Catholic Church in the ...

[View Full Caption](#)

DNAinfo/Ted Coz

**OLD TOWN TRIANGLE** — The city has moved to seize control of a historic landmark district building that it says has been left to rot at 1720 N. Sedgwick Ave.

"We believe that this owner is allowing the building to deteriorate so he can obtain a demolition permit," said Ald. Michele Smith

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## How Tall Will New Buildings in My Chicago Neighborhood Be?

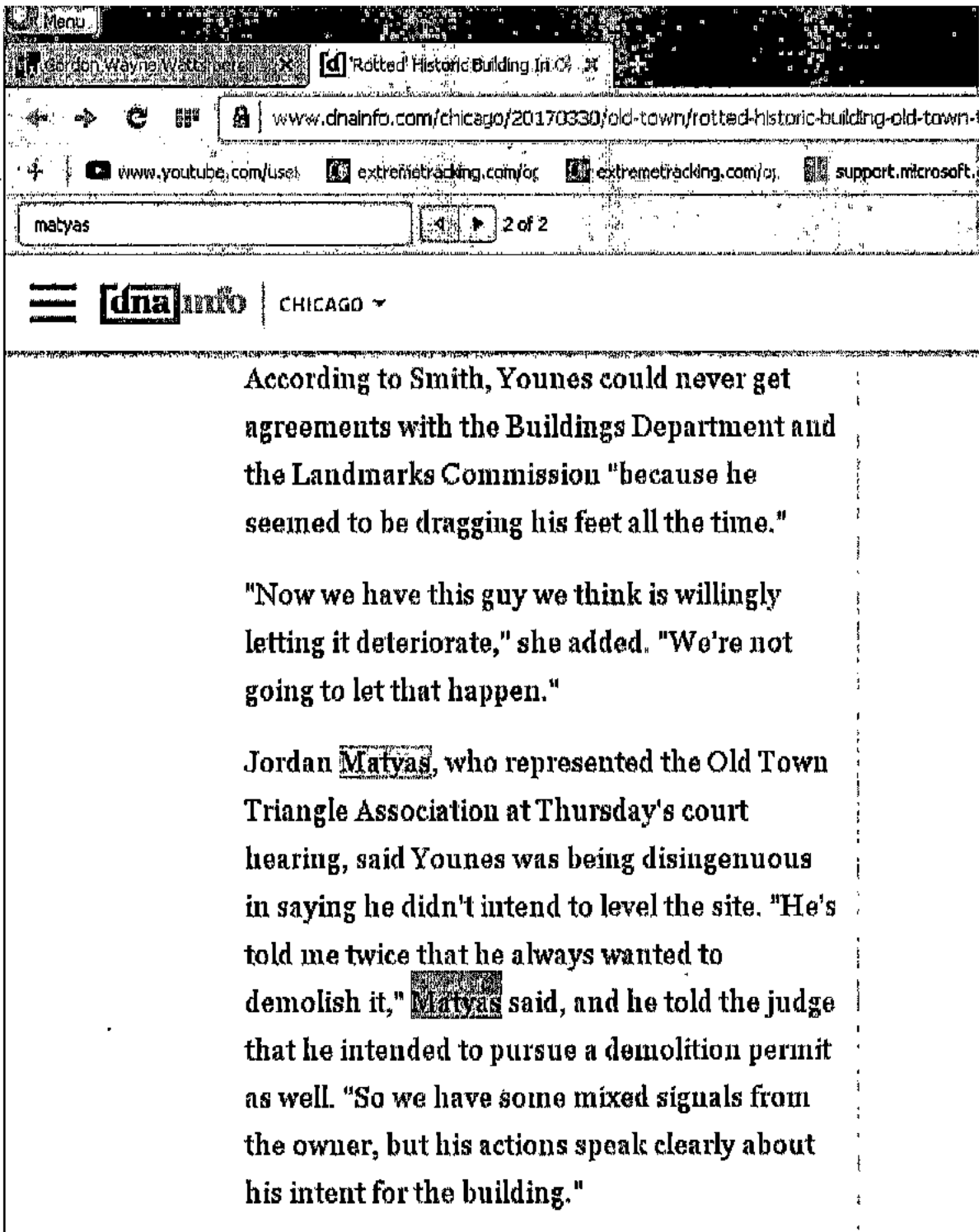
Let's find out.



Recommended



## A-2 (section quoting Jordan Matyas, who effectively calls Younes a liar)



Menu

John Wayne Watson

Rotted Historic Building In Old Town

www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-

www.youtube.com/user/... extremetracking.com/jo... extremetracking.com/jo... support.microsoft.com

matyas 2 of 2

**dnainfo** | CHICAGO ▾

According to Smith, Younes could never get agreements with the Buildings Department and the Landmarks Commission "because he seemed to be dragging his feet all the time."

"Now we have this guy we think is willingly letting it deteriorate," she added. "We're not going to let that happen."

Jordan Matyas, who represented the Old Town Triangle Association at Thursday's court hearing, said Younes was being disingenuous in saying he didn't intend to level the site. "He's told me twice that he always wanted to demolish it," Matyas said, and he told the judge that he intended to pursue a demolition permit as well. "So we have some mixed signals from the owner, but his actions speak clearly about his intent for the building."

Reminder: AOL will never ask you for your password or billing information.

**Subject:** copies file 07ch29738,04ch10851,14m1701473  
**Date:** 7/16/2015 12:30:29 P.M. Eastern Daylight Time  
**From:** sblew@cookcountycourt.com  
**To:** [www1210@gmail.com](mailto:www1210@gmail.com)  
**CC:** [dwyl1210@aol.com](mailto:dwyl1210@aol.com), [meddinh@cookcountycourt.com](mailto:meddinh@cookcountycourt.com)  
*Sent from the Internet (Details)*

Hello Mr. Gordon,

Please see attachment,

Thank you,

Sharon Briggins -- Levy  
Manager Chancery Division  
(312) 603 -3287

=



Click Search  
Client ID

implment@cookcountycourt.com

Orders Fulfillment Cook Co District 1 - Chancery (01020)

Your order has been updated.  
Your order has been authorized.

Order: 50280881						
Order Details		Order Summary		Comments		
Order Details						
Line #	Product	Price	Reference #			
1	Chancery Division Fees/Costa (8613)	102.50	2004ch1081			
Payment						
#	Type	Amount	Card/Acct	Last Name	First Name	Status
1	CC	104.68	MC 2738	Watts	Gordon	Authorized
Status		Order Open Payment Paid In Full				
Source		POS				
Fee Data		Agency 102.50 Expedite 0.00 Misc 0.00 VitalChek 2.18 Shipping 0.00 Other 0.00 Total 104.68				
Print Receipt						

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Order Open Payment Paid In Full	
Source	POS
Fee Data	
Agency	102.50
Expedite	0.00
Misc	0.00
VitalChek	2.18
Shipping	0.00
Other	0.00
<b>Total</b>	<b>104.68</b>
Print Receipt	

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

THE HONORABLE DOROTHY BROWN  
CLERK OF THE CIRCUIT COURT  
COOK COUNTY, IL

DATE: 7/24/2015 TIME: 4:16PM  
TN: 0010-0001 RN: 00066575  
DIST: 01 DIV: Chancery  
CHNI-134 CASHIER: JESSICAP CR#: 529

ATTORNEY NO: 99500

REF CASE NO: 2004ch10851  
REF OTHER: 2007CH

CASE TOTAL: \$102.50

Copy Fee	\$75.50
Record Searches	\$27.00
CREDIT CARD:	\$102.50
CHANGE	\$0.00

RECEIPT 0001 OF 0001	
TRANSACTION TOTAL:	\$102.50

THANK YOU

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

THE HONORABLE DOROTHY BROWN  
CLERK OF THE CIRCUIT COURT  
COOK COUNTY, IL

DATE: 7/31/2015 TIME: 12:00PM  
TN: 0003-0001 RN: 00066663  
DIST: 01 DIV: Chancery  
CHN1-134 CASHIER: JESSICA CR#: 534

ATTORNEY NO: 99500  
REF CASE NO: 2007ch29738  
REF OTHER:

CASE TOTAL: \$10.00  
Copy Fee \$10.00  
CREDIT CARD: \$10.00  
CHANGE \$0.00  
RECEIPT 0001 OF 0001  
TRANSACTION TOTAL: \$10.00

THANK YOU

<b>Status</b>	
Order	Open
Payment	Paid In Full
<b>Source</b>	POS
<b>Fee Data</b>	
Agency	10.00
Expedite	0.00
Misc	0.00
VitalChek	0.21
Shipping	0.00
Other	0.00
<b>Total</b>	<b>10.21</b>
<b>Print Receipt</b>	

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Walmart MasterCard

GORDON W. WATTS  
Account Number: xxxxxxxx2739

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Customer Service: 1-888-511-1148

Summary of Account Activity	
Previous Balance	\$4,353.74
- Payments	\$994.24
+ Purchases/Debits	\$1,211.07
+ Interest Charges	\$173.81

**New Balance** \$3,564.38

Credit Limit	\$10,000
Available Credit	\$6,435
Cash Advance/Quick Cash Limit	\$2,000
Available Cash	\$2,000
Statement Closing Date	07/17/2015
Days in Billing Cycle	30

Payment Information	
New Balance	\$3,564.38
Total Minimum Payment Due	\$110.00
Payment Due Date	08/10/2015

**Late Payment Warning:** If we do not receive your minimum payment by the date listed above, you may have to pay a late fee up to \$35.00.

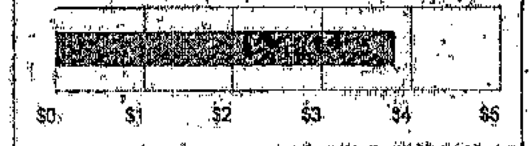
**Minimum Payment Warning:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make only the minimum payment	You will pay in interest	You will spend more on your balance
Only the minimum payment	18 years	\$9,033.00
\$138.00	3 years	\$4,980.00 (Savings = \$4,073.00)

If you would like information about credit counseling services, call 1-877-802-8775.

Rewards Summary	
Previous Balance	\$2.60
+ Earned This Period Balance	\$1.20
- Balance	\$3.80

**Rewards News**  
Earning Rewards is easy! Every time you earn \$5, you will receive a Rewards Credit on your statement!



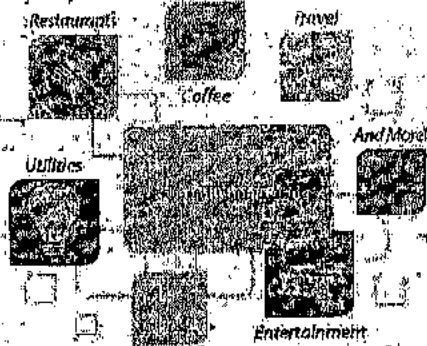
07/17/2015

Gordon W. Watts  
CREDIT CARD  
STATEMENT



Use your card everywhere  
MasterCard® is accepted to

**Earn Rewards.**



\* See the Walmart Rewards Card Rewards Program Terms at [walmart.com](#).  
The Walmart Rewards Card is issued by Synovus Bank pursuant to an agreement by MasterCard International Incorporated. MasterCard is a registered trademark of MasterCard International Incorporated.  
The following are marks and/or registered marks of (W) Walmart, (M) MasterCard, and (S) Synovus Bank.

Date	Reference Number	Description of Transaction or Credit	Amount
08/25	85239148HROXTMJJH	PYMNT IN STORE THANK YOU LAKELAND	(\$54.84)
08/28	85641088K003NIMYRU	INDO FOODMART 639 LAKELAND FL	\$1.00
08/30	85201148HROXTMJJH	PYMNT IN STORE THANK YOU BARTOW	(\$87.83)
08/30	85201148HROXTMJJH	PYMNT IN STORE THANK YOU BARTOW	(\$500.00)
07/03	86239148HROXTMJJH	PYMNT IN STORE THANK YOU PLANT CITY	(\$67.83)
07/07	86410125WM1931NASS	FEDEX 480020389 MEMPHIS TN	\$63.86
07/08	86429506XFL820RKE	EBAY INC 01902088800 CA	\$37.00
07/08	85239148HROXTMJJH	PYMNT IN STORE THANK YOU LAKELAND	(\$64.86)
07/14	85410125WM1931NASS	FEDEX 480121124 MEMPHIS TN	\$29.87
07/14	85239148HROXTMJJH	PYMNT IN STORE THANK YOU LAKELAND	(\$150.00)
07/16	054084480040FFB0	COOK CO FIRST MUNICIPAL CHICAGO IL	\$21.19
<b>FEES</b>			
<b>TOTAL FEES FOR THIS PERIOD</b>			\$80.60
<b>INTEREST CHARGED</b>			
INTEREST CHARGE ON PURCHASES			\$73.81
INTEREST CHARGE ON CASH ADVANCES			\$0.00
<b>TOTAL INTEREST FOR THIS PERIOD</b>			\$73.81

Fees Total Year To Date	
Total Fees Charged to 2015	\$0.00
Total Interest Charged to 2015	\$401.51
Total Interest Paid to 2015	\$327.70

07/16  
2015

June 2015  
Invoice

3000000  
Gift  
Debit  
Cards

#139  
Judy  
Montgomery,  
TX  
263-46  
Hobby

eBay  
#137  
Judy  
Montgomery, AL  
Hobby  
Savannah, TX

PUBLIC RECORDS  
for  
Rick Damigels

\$21.19  
Richard & Damigels Public Records Request  
for file # 3 out of identical signatures  
in 2 warranty books showing forgery etc

Walmart

Get up to \$100 Quick Cash at the register with the Walmart® Credit Card.

Statement

09-17-2015



No ATM Fees

Just select the amount you need in \$20 increments using the debit reader when you're checking out.

Amici Curiae briefs  
Cherney, Civil Law, STATE + Appeal Court  
MORTGAGE FRAUD + Envelopes  
Scotch Tape

Get up to \$100 quick cash at the register when you make a purchase with your Walmart Credit Card in participating registers in participating states. Limit one per day. This cash advance will appear on your monthly billing statement. See 2.2.1.1. Subject to credit approval. The Walmart® Debit Card is issued by Firstory Bank pursuant to a license by Firstory Bank to Walmart. Walmart® Debit Card is a registered trademark of MasterCard International Incorporated. The following are trademarks for registered marks of Walmart: Walmart, Walmart, and State Money Line Bank.

Debit Fraud Daniggelis

09/10/2015

19.50 Debit Fraud

Trans. Date	Post Date	Reference Number	Description of Transaction or Credit	Amount
09/10	09/10	054101077M1471NRE	FEDEX 40282434 MEMPHIS, TN	\$65.01
09/10	09/10	054101077M1471NRE	FEDEX 40281289 MEMPHIS, TN	\$150.25
09/10	09/10	05219147K00XTM1JH4	RYMINT IN STORE THANK YOU LAKELAND FL	(\$207.00)
09/10	09/10	054101077M1471NRE	FEDEX 40384994 MEMPHIS, TN	\$8.89
09/10	09/10	054101077M1471NRE	FEDEX 404211701 MEMPHIS, TN	\$65.01
09/10	09/10	05429807WRL77X81Q	BBAY (NO. 0882838880 CA	\$97.89
09/10	09/10	054101077M1471NRE	FEDEX OFFICE 00008508 LAKELAND FL	\$88.21
09/10	09/10	054101077M1471NRE	USPS 149220835710700 LAKELAND FL	\$11.00
09/10	09/10	054101077M1471NRE	FEDEX OFFICE 00008508 LAKELAND FL	\$271.72
09/10	09/10	054101077M1471NRE	FEDEX OFFICE 00008508 LAKELAND FL	\$44.25
09/10	09/10	054101077M1471NRE	FEDEX OFFICE 00008508 LAKELAND FL	\$48.89
09/10	09/10	05219147K00XTM1JH4	RYMINT IN STORE THANK YOU LAKELAND FL	(\$92.71)
09/12	09/12	054101077M1471NRE	FEDEX 40480238 MEMPHIS, TN	\$154.78
09/13	09/13	05219147K00XTM1JH4	WALMART 000771 LAKELAND, FL	\$58.54
09/13	09/13	05219147K00XTM1JH4	RYMINT IN STORE THANK YOU LAKELAND FL	(\$40.18)
09/14	09/14	054101077M1471NRE	FEDEX 404780701 MEMPHIS, TN	\$10.38
09/14	09/14	054101077M1471NRE	FEDEX OFFICE 00008508 LAKELAND FL	\$2.38
09/14	09/14	054101077M1471NRE	FEDEX OFFICE 00008508 LAKELAND FL	\$25.74
09/14	09/14	05428882000BZ2110	THE UPS STORE 1980 LAKELAND, FL	\$25.17
09/14	09/14	05428882000BZ2110	LOUISIANA PLATS BURRITO LAKELAND, FL	\$16.00
09/10	09/10	05219147K00XTM1JH4	RYMINT IN STORE THANK YOU LAKELAND FL	(\$20.01)
09/17	09/17		REWARDS/SPECIAL OFFER CREDIT	(\$10.00)
			FEES	
			TOTAL FEES FOR THIS PERIOD	\$0.00
			INTEREST CHARGED	
09/17	09/17		INTEREST CHARGE ON PURCHASES	\$95.93
09/17	09/17		INTEREST CHARGE ON CASH ADVANCES	\$0.00
			TOTAL INTEREST FOR THIS PERIOD	\$95.93

8.99 Daniggelis  
33.73 Daniggelis  
19.32 Daniggelis  
+ 53.05

Point J Daniggelis  
Daniggelis

Food Daniggelis Case  
To Let Apple Cakes

Category	2015 Total Year to Date
Total Fees Charged in 2015	\$0.00
Total Interest Charged in 2015	\$95.93
Total Interest Paid in 2015	\$478.64

Type of Advance	Expiration Date	Annual Percentage Rate	Balance Subject To Interest Rate	Interest Charge
Regular Purchases	NA	21.90%	\$0.00136	\$95.93
Cash Advances	NA	25.90%	\$0.00	\$0.00

Eligible card purchases may be billed under one of the following promotions. No interest if Paid in Full within 6, 12, 18 or 24 months. Either each of these promotions, if the promotional balance is not paid in full within the promotional period, interest will be imposed from the date of purchase at a rate of 22.90%. If a (v) is shown after your APR is the Interest Charge Calculation section of this billing statement, the APR is a variable rate and will vary with the market based on the Prime Rate. Minimum monthly payments are required. See promotional advertising for further details.

If your account has a deferred interest promotion and you would like us to apply it to your account to a specific balance, please call Customer Service to discuss options that may be available.

131.78  
S/A  
Fedex Exp  
To Truck  
+ Apple Cakes  
Debit Fraud  
Daniggelis

\$11.50  
Ship to Daniggelis

Walnut Multimeter  
Duct Tape, Scotch Tape

576 x 0.0960%  
= 55.30  
+ 3.87  
\$ 59.17



FILED DATE: 2/27/2019 7:28 PM 2007CH29738



Card Activity

card number: xxx-2748 expiration date: 06/18 card status: a

- Account
- Card activity
- Statements
- Report card or statement
- Activate card
- Request a replacement card

Available Balance \$56.57

Pending Transactions 2 transactions

- Gordon's Indulge
- 96.70 pd to CVS
- 3.95 activation fee
- = \$92.75
- 2.99 McD
- 0.50 Transaction fee
- = \$86.26
- 32.50 Law Division
- Public Records
- 0.50 Tax fee
- 0.69 convenience fee
- = \$55.57 Balance
- check(s) :

- EQpd
- How to Report
- Report Card
- Download Direct Deposit form

DATE	TRANSACTION	DEBIT	CREDIT
12/03/2015	MCDONALD'S F100 LAKELAND IL Reference: 040013101A7 Description: PREAUTH TRANSACTION	\$2.99	
12/03/2015	LN COOK CO LAW DIV CHICAGO IL Reference: 060013E49FE Description: PREAUTH TRANSACTION	\$33.19	

Reference number the operator gave me: 53261672  
\$32.50 + 0.69 convenience fee = \$33.19

Date & Time Time Zone & Interval Time

Date: December 2015

31	2	3	4	5
6	7	8	9	10
11	12	13	14	15
16	17	18	19	20
21	22	23	24	25
26	27	28	29	30
31				

Current month transaction history: 0 transactions

ZOOM view:

12/03/2015	MCDONALD'S F100 LAKELAND IL Reference: 040013101A7 Description: PREAUTH TRANSACTION	\$2.99
12/03/2015	LN COOK CO LAW DIV CHICAGO IL Reference: 060013E49FE Description: PREAUTH TRANSACTION	\$33.19

Reference number the operator gave me: 53261672  
\$32.50 + 0.69 convenience fee = \$33.19

Date and Time Properties

Date & Time: Time Zone: Interval

Date: December 2015

1 23 4 5

# Axiom Bank

axiombanking.com • (800)584-9915

Jan. 13:

004461  
 GORDON WAYNE WATTS  
 821 ALICIA RD  
 LAKELAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY

STATEMENT DATE	JAN 15 16
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	123.91
DEPOSIT AMOUNT	377.68
WITHDRAWAL AMOUNT	346.89
SERVICE CHARGE	.00
ENDING BALANCE	154.70

\$2.25

Cook County, IL (COURTS)  
 LAW DIVISION, Public Records Request

AXIOM CHECKING ACTIVITY BEGINNING	2100653548 DEC 16 15	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
DEC 26 DEPOSIT LAKELAND			300.00	\$ 123.91
DEC 26 RADIOSHACK CORP PLANT CITY FL US *****6014 13817601	POS 442987	41.84		\$ 323.91
DEC 28 THE HOME DEPOT 2 LAKELAND FL US *****8464 06098901	POS 130402	79.60		\$ 282.07
DEC 28 THE HOME DEPOT 2 LAKELAND FL US *****6014 06098901	POS 171594	54.24		\$ 202.47
DEC 28 AMAZON DIG689922 CCD 69897670	Misc. Paym 151221	.68		\$ 148.23
DEC 30 Clearpoint Finan BILL PYMNT PPD		120.00		\$ 148.91
JAN 02 WM SUPERCENTER PLANT CITY FL US *****8464 89999999	POS 000005	19.05		\$ 28.86
JAN 11 DEPOSIT LAKELAND			111.00	\$ 120.86
JAN 19 DEPOSIT LAKELAND			66.00	\$ 186.86
JAN 19 CN COOKCO LAKELAND FL US *****8464 89999999	POS 089245	2.25		\$ 184.61
JAN 14 OREILLY AUTO PARTS LAKELAND FL US *****8464 05371609	POS 089245	29.91		\$ 154.70

THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$154.70

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 154.70	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 154.70	

19.05 = 5 gals of  
 gas + tax for  
 main PC house -  
 front door - Lacks Dec 12

110.48 payment  
 + 9.52 Pp  
 = \$120.00



FILED DATE: 2/27/2019 7:28 PM 2007CH29738

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



004271  
 GORDON WAYNE WATTS  
 821 ALICIA RD  
 LAKELAND FL 33801-2113

SUMMARY OF YOUR ACTIVITY

STATEMENT DATE FEB 15 16  
 STATEMENT NUMBER 2100653548  
 BEGINNING BALANCE 154.70  
 DEPOSIT AMOUNT + 261.92  
 WITHDRAWAL AMOUNT - 413.38  
 SERVICE CHARGE - .00  
 ENDING BALANCE 3.23

AXIOM CHECKING		2100653548			BALANCE SUMMARY
ACTIVITY BEGINNING		JAN 16 16	WITHDRAWALS	DEPOSITS	\$ 154.70
JAN 21	COOK CO FIRST MUNICIPA	POS	13.28		\$ 141.42
	CHICAGO IL US	000000			
	*****8464 99999999				
JAN 26	DEPOSIT LAKELAND			260.00	\$ 401.42
JAN 29	AMAZON ACH/CRED IAT			1.92	\$ 403.34
FEB 01	Clearpoint Finan BILL PYMNT PFD		120.00		\$ 283.34
FEB 06	FEDEXOFFICE 00008508	POS	275.42		\$ 7.92
	LAKELAND FL US	000086			
	*****8464 03P				
FEB 08	FEDEXOFFICE 00008508	POS	4.69		\$ 3.23
	LAKELAND FL US	000002			
	*****8464 04P				
THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$					190.61

SUMMARY OF YOUR DEPOSIT ACCOUNTS

ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	\$ 3.23	
TOTAL OF YOUR DEPOSIT ACCOUNTS		\$ 3.23	

Banking and More®

Public Records REQUEST



Point of Sale Transaction  
 Cook County, IL Courts  
 Records Request  
 \$13.28  
 Cook County, IL Courts

Looks OK:  
 My own notes, in my own handwriting, mention EARS #275,42  
 FedEx remittance



B-11 (AxiomBanking 05/17/2016 ship FOIA research via UPS to Daniggelis, \$20.64;  
 (AxiomBanking 05/26/2016 pay for FOIA research printouts to UPS to Daniggelis, \$9.60)

# AXIOM BANK

axiombanking.com • (800) 584-0016

003792  
 GORDON WAYNE WATTS  
 821 ALICIA RD  
 LAKELAND, FL 33801-2113

SUMMARY OF YOUR ACTIVITY	
STATEMENT DATE	JUN 15 18
STATEMENT NUMBER	2100653548
BEGINNING BALANCE	30
DEPOSIT AMOUNT	+ 187.17
WITHDRAWAL AMOUNT	- 150.24
SERVICE CHARGE	- .00
ENDING BALANCE	37.23

AXIOM CHECKING	2100653548	ACTIVITY BEGINNING	MAY 14 18	WITHDRAWALS	DEPOSITS	BALANCE SUMMARY
MAY 14	3501 FLORIDA AVE	LAKELAND FL US	ATM 001542		90.00	\$ 30.30
MAY 17	THE UPS STORE 2872	CHICAGO IL US	POS 000008	20.64		\$ 69.66
MAY 18	DEPOSIT LAKELAND				95.00	\$ 164.66
MAY 26	THE UPS STORE 1053	CHICAGO IL US	POS 000000	9.60		\$ 155.06
MAY 31	AMAZON DIG738757 Misc. Paym				2.17	\$ 157.23
MAY 31	Clearpoint Finan BILL PYMNT PPD			120.00		\$ 37.23
THE AVERAGE BALANCE FOR 2100653548 IN THIS STATEMENT PERIOD WAS \$						66.33

SUMMARY OF YOUR DEPOSIT ACCOUNTS			
ACCOUNT DESCRIPTION	ACCOUNT NUMBER	ACCOUNT BALANCE	MATURITY DATE
AXIOM CHECKING	2100653548	37.23	
TOTAL OF YOUR DEPOSIT ACCOUNTS		37.23	

Printout for  
 Rich Daniggelis  
 Mortgage Front Docs

POS =  
 "Point of Sale"  
 Transaction

Ship some research of records to Rich Daniggelis  
 UPS Store # 2872 (Chicago, IL) \$20.64  
 Pay for Printouts of more RECORDS research  
 UPS Store # 1053 (Chicago, IL) \$9.60

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

USPS - 7015-1730-0001 - 2318-468

Ret. Receipt. 9590 9403-0734-5196123868

From the Desk of: Gordon Wayne Watts  
821 Alicia Road - Lakeland, FL 33801-2113  
H: (863) 688-9880 - C: (863) 409-2109 - W: (863) 686-3411 or: (863) 687-6141  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)  
Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

Hon. Tina M. Schillaci, Esq., Law Clerk / Staff Appellate Attorney, (312) 793-6199  
c/o 1st District Appellate Court, Clerk's Office  
160 North LaSalle St., Chicago, IL 60601-3130  
(312) 793-5484 . Office Hours: 8:30am - 4:30pm (CST)

Home Copy

Re: GMAC Mortgage, LLC v. Richard B. Daniggelis, et al.  
Case No: 1-14-2751  
A/S Joseph Yonous, Est. v. Richard B. Daniggelis, et al.  
Case No: 1-15-0662

Friday, 01 July 2016  
Axiom Bank  
Money Order # 41742051

Dear Attorney Schillaci:

Balance 200 65 35 48

07/01/2016  
Acct # 28175000 + \$ 76.25

Thank you for speaking with me last Friday morning (Fri. 24 June 2016) and this past Tuesday evening (Tue. 28 June 2016), and giving me the proper protocol and procedures for making a records request of court filings in your court with regard to the two court cases cited above. I am sorry that I am somewhat slow to respond, but I have been busy with many things recently.

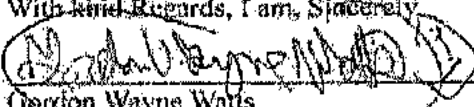
According to my recollection and notes, it would appear that you told me that the entire file in 1-14-2751 contained 172 pages, which, at \$0.25/page, would cost me \$43.00 even, and that 1-15-0662 contained 133 pages, which would cost me \$33.25, for a sum total of \$76.25, and that your court only accepted payment by cash, check, or money order, payable to "Clerk of the Appellate Court" (but had not yet set up payment by credit card or bank account, electronic draft), and, also, that your court did not prefer to deal in case for obvious reasons of security and documentation of the currency. - You also said that if I were short, you could not advance credit, and would require payment in advance. - Moreover, my notes reflect that if the opposite was the case (overpayment), you warned and cautioned me that your court could not issue any refund of excess payment, not even were I to include cash currency as part of all of the payment method, as your court's policy also prohibited sending cash by mail as well.

Because of that, I must get the payment amount "exact" or else risk over-payment (with no avenue or means for giving me change back for overpayment) or under-payment (where I can't get all the records I seek). For that reason, I made a call to your court to ascertain & determine whether any new filings or court orders had been entered into the record on appeal in either of the 2 above-captioned cases. After several unsuccessful tries (one time, a clerk said a motion was due on a certain date, but never answered my question about one case, and then hung up before I could inquire about the other case - meaning, she never answered me at all!), I finally determined that nothing new had been entered in either of these 2 cases since we spoke last week.

I wish you the best in getting your court set up for electronic payment (of "records request" fees) by Credit Card; electronic release of records (by email in PDF or image format in email attachments, like the trial courts currently do); and online dockets (preferably with click-to-see of an image of the docket entry, but at least a docket of the entries, like the trial courts currently provide the public).

Please find, enclosed a money order for \$76.25 for the file in both cases.

7015-1730-0001 - 2318-468  
USPS 07-01-2016 (Friday)

With kind Regards, I am, Sincerely  
  
Gordon Wayne Watts

Bank Acct # 200 65 35 48  
Money Order # 41742051  
Acct # 28175000 (Bank)  
07-01-2016 for \$ 76.25

Ret. Receipt. 9590 9403-0734-5196123868



**B-14 (FOIA replies of 06/03/2016 and 04/07/2017 from City of Chicago, Building Dept. Cost: TIME)**

5/16/2017

Re: "Public Records request: BUILDING Dept - City of Chicago"

From: DOBFOIA <DOBFOIA@cityofchicago.org>

To: Gww1210 <Gww1210@aol.com>

Subject: Re: "Public Records request: BUILDING Dept - City of Chicago"

Date: Fri, Jun 3, 2016 9:41 am

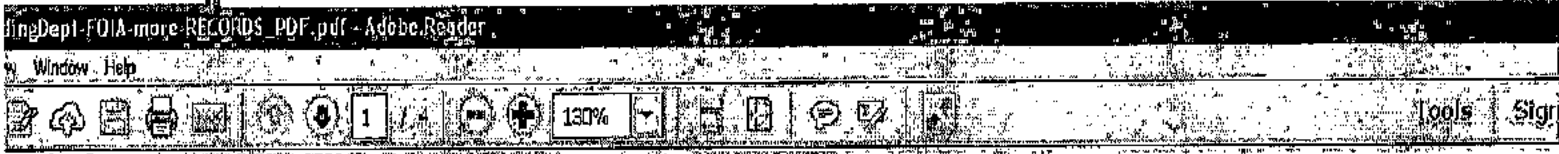
Attachments: 1720\_N\_Sedgwick.pdf (266K)

Mr. Watts:

The records you requested are attached.

Sincerely,

C. Lynch  
City of Chicago, Dept. of Buildings



5/16/2017

Re: "Public Records request: BUILDING Dept - City of Chicago"

From: DOBFOIA <DOBFOIA@cityofchicago.org>

To: gww1210 <gww1210@aol.com>

Subject: Re: "Public Records request: BUILDING Dept - City of Chicago"

Date: Fri, Apr 7, 2017 4:59 pm

Attachments: 1720\_N\_Sedgwick1.pdf (17K), 1720\_N\_Sedgwick.pdf (17K)

Mr. Watts:

Regarding your question as to whether there were any photos taken of the Stop Work Orders for 1720 N. Sedgwick, I have attached the latest records I have for this address.

Sincerely,

C. Lynch  
City of Chicago, Dept. of Buildings

From: gww1210@aol.com <gww1210@aol.com>

Sent: Friday, March 31, 2017 12:44:59 PM

To: DOBFOIA; DOB-info

Cc: DOBFOIA; Lynch, Chris; Porche, Rodney; gww1210@aol.com; gww1210@gmail.com

Subject: Re: "Public Records request: BUILDING Dept - City of Chicago"

Chris, this is Gordon again.

I hate to bother you, but these criminals that have been trying to destroy the house at 1720 North Sedgwick Street, Old Town, Chicago, IL (and resolutely make you all very busy, when y'all have to repeatedly put up "Stop Work Order" signs to put a stop to the illegal construction, demolition, & destruction of property), and I feel the need to do more news coverage.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

5/16/2017

FW: Scanned from a Xerox multifunction device

From: FOIA <foia@chicagopolice.org>

To: Gww1210 <Gww1210@aol.com>

Subject: FW: Scanned from a Xerox multifunction device

Date: Tue, Jun 7, 2016 6:00 pm

Attachments: Scanned from a Xerox multifunction device001.PDF (2172K)

---

Good Afternoon,

Attached to this email is a response to your FOIA request.

Regards,

FOIA Section

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering that message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this document is strictly prohibited.

---

From: xerox@chicagopolice.org [xerox@chicagopolice.org]

Sent: Tuesday, June 07, 2016 5:56 PM

To: FOIA

Subject: Scanned from a Xerox multifunction device

Please open the attached document. It was scanned and sent to you using a Xerox multifunction device.

Attachment File Type: PDF

multifunction device Location: machine location not set

Device Name: HQ-X414NE-1

For more information on Xerox products and solutions, please visit <http://www.xerox.com>





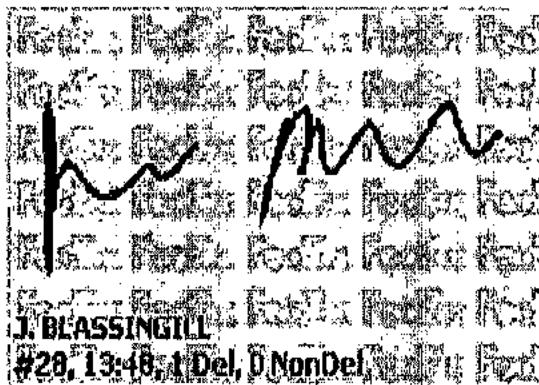
September 18, 2015

Dear Customer:

The following is the proof-of-delivery for tracking number 781311007128.

**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivery location:</b>	333 W NORTH AVE Chicago, IL 60610
<b>Signed for by:</b>	JBLASSINGILL	<b>Delivery date:</b>	Sep 15, 2015 13:51
<b>Service type:</b>	FedEx Ground		
<b>Special Handling:</b>			



**Shipping Information:**

<b>Tracking number:</b>	781311007128	<b>Ship date:</b>	Sep 10, 2015
		<b>Weight:</b>	1.6 lbs/0.7 kg

**Recipient:**  
 Richard B Daniggelis  
 c/o The UPS Store  
 333 W North Ave  
 Chicago, IL 60610 US

**Shipper:**  
 Gordon Watts  
 Gordon Watts  
 821 ALICIA RD  
 LAKELAND, FL 33801 US

Thank you for choosing FedEx.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**B-17 (FOIA replies of May 18, May 25, June 1, June 8, 2016 from IL Office of Atty Gen; Cost: TIME)**

6/18/2017

Freedom of Information Act Request 2016 FOIA 41830

From: FOIA Officer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, May 18, 2016 12:45 pm

Attachments: 41830 Partial Closing and Extension Letter.pdf (71K)

Dear Mr. Watts:

Attached please find a letter pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte

FOIA Officer

Assistant Attorney General

Office of the Illinois Attorney General

E-MAIL CONFIDENTIALITY NOTICE: This electronic mail message, including any attachments, is for the intended recipient(s) only. This e-mail and any attachments might contain information that is confidential, legally privileged or otherwise protected or exempt from disclosure under applicable law. If you are not a named recipient, or if you are named but believe that you received this e-mail in error, please notify the sender immediately by return e-mail and promptly delete this e-mail and any attachments and copies thereof from your system. If you are not the intended recipient, please be aware that any copying, distribution, dissemination, disclosure or other use of this e-mail and any attachments is unauthorized and prohibited. Your receipt of this message is not intended to waive any applicable privilege or claim of confidentiality, and any prohibited or unauthorized disclosure is not binding on the sender or the Office of the Illinois Attorney General. Thank you for your cooperation.

From: FOIA Officer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Date: Wed, May 25, 2016 4:21 pm

Attachments: 41830 RM - Paul Shelton.pdf (1661K), 41830 Confirm 5.19.16 Convo, Partial Closing and Extension Letter.pdf (134K)

Dear Mr. Watts:

Attached please find a letter and records pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte  
FOIA Officer

From: FOIA Officer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, Jun 1, 2016 1:13 pm

Attachments: 41830 RM - Gordon Watts 2016 (1).pdf (5285K), 41830 RM - Gordon Watts 2016 (2).pdf (5864K), 41830 Partial Closing and Extension Letter.pdf (113K)

Dear Mr. Watts:

Attached please find a letter and records pertaining to your recent FOIA request.

Very truly yours,

Caitlin Q. Knutte  
FOIA Officer

From: FOIA Officer <F@atg.state.il.us>

To: 'gww1210@aol.com' <gww1210@aol.com>

Cc: Possley, Maura <MPossley@atg.state.il.us>; Boyce, Eileen <EBoyce@atg.state.il.us>; Thompson, Annie <PThompson@atg.state.il.us>

Subject: Freedom of Information Act Request 2016 FOIA 41830

Date: Wed, Jun 8, 2016 2:29 pm

Attachments: 41830 RM - Joseph Younes.pdf (3296K), 41830 RM - Pleadings (1 41830 RM - Pleadings (2).pdf (2284K), 41830 RM - Pleadings (3).p

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



DEPARTMENT OF PLANNING AND DEVELOPMENT  
CITY OF CHICAGO

April 12, 2017

Gordon Wayne Watts  
The Register  
821 Alicia Road  
Lakeland, FL 33801

VIA ELECTRONIC MAIL: Gww1210@aol.com

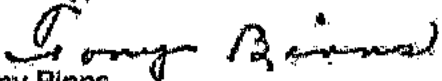
Dear Mr. Watts:

On behalf of the Department of Planning and Development (DPD), please be advised we are in receipt of your Freedom of Information Act (FOIA) request. Your request was dated and received on April 7, 2017. Specifically, the FOIA states and seeks the following request for public records:

*Please email me an audio file of the "Regular Meeting" of the Commission on Chicago Landmarks, which occurred yesterday, Thursday, April 6, 2017 at 12:45 p.m. in City Hall, 121 North LaSalle Street, Room 201-A, 2<sup>nd</sup> Floor.*

Enclosed for your review is the CD disc of the audio file from the April 6, 2017 Commission on Chicago Landmarks meeting.

Sincerely,

  
Tony Binns  
Freedom of Information Officer  
City of Chicago Department of Planning and Development  
(312) 744-0986



April 26, 2017

Dear Customer:

The following is the proof-of-delivery for tracking number 7862-7122-6226.

**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivery location:</b>	821 ALICIA RD Lakeland, FL 33801
<b>Signed for by:</b>	Signature not required	<b>Delivery date:</b>	Apr 26, 2017 09:53
<b>Service type:</b>	FedEx Ground		
<b>Special Handling:</b>			

**NO SIGNATURE REQUIRED**

Proof-of-delivery details appear below; however, no signature is available for this FedEx Ground shipment because a signature was not required.

**Shipping Information:**

<b>Tracking number:</b>	7862-7122-6226	<b>Ship date:</b>	Apr 18, 2017
		<b>Weight:</b>	1.8 lbs/0.8 kg

**Recipient:**  
JOSEPH YOUNES LAW OFFICES  
JOSEPH YOUNES LAW OFFICES  
166 W WASHINGTON ST  
STE 600  
CHICAGO, IL 60602 US

**Shipper:**  
gordan watts  
gordan watts  
821 ALICIA RD  
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

Reminder: AOL will never ask you for your password or billing information.

Show images & enable links

Subject: FedEx Shipment 786271226226 Delivery Exception

Date: 4/21/2017 10:24:48 P.M. Eastern Daylight Time

From: trackingupdates@fedex.com

Reply To: trackingmail@fedex.com

To: www1210@aol.com

Sent from the Internet (Details)

### Tracking # 786271226226

Ship date:  
Tue, 4/18/2017

Scheduled delivery:  
Mon, 4/24/2017 by end  
of day

Delivery exception

### Shipment Facts

FedEx attempted, but was unable to complete delivery of the following shipment:

Tracking number:	786271226226
Status:	Delivery exception
Service type:	FedEx Ground
Packaging type:	Package
Number of pieces:	1
Weight:	0.70 lb.
Standard transit:	4/21/2017

### Resolving Delivery Issues

The reason delivery was not completed is outlined below. Where applicable, resolution recommendations are also provided.

Exception Reason	Recommended Action
1. Refused by recipient - Not ordered	No action is required. The package is being returned to the shipper.
2. Shipment Refused by Recipient	No action is required. The package is being returned to the shipper.

FRONT  
GARDEN WATTS (6822) 6811  
821 ALICIA RD  
LAKELAND, FL 33901

3  
MCC  
Day  
p.Joseph Youmes/599467626  
3716 per website  
02-018 01/2017  
4-21-17  
STATION# 606  
ISSUED BY VLG  
AGENCY APPROVAL DISPATCH#  
RETURN STATE FL  
TO  
RETURN ZIP TO 3380  
Remove label here

SHIP LABEL REV 03/10 - RUN 1/2017

NLP FACILITY

**FedEx RETURN TO SHIP**

Dear Customer - This package is being returned.

Held at Location - Expired.

Delivery refused by: JOE

Because:

Incorrect delivery address/Recipient unknown/Closed.

Damaged: An inspection report has been completed.

The entire contents of the package are enclosed.

Damaged contents were discarded. The balance is enclosed.

Package is greater than the maximum size/weight allowed.

Delivery attempts unsuccessful/unable to reach recipient for alternate delivery instructions.

Improper HazMat packaging/labeling/documentation.

ATTN FedEx Personnel: Attach the OP-908 & SF-136 to all Hazmats.

Other:

Package received on trailer from shipper:

Crushed  Wet  Oversize

Open  Inadequate Packaging  Overweight

7862 7122 6226


4-21-17

60602

822-0417-3 (800-000-0000) 0-00 7862 7122 6226



Joseph Youmes Law Offices  
166 WASHINGTON ST  
Phone: (312) 372-1122 F  
Email is (or was?) Joe@joe69



(951)912 7176804 8930345-1

220-1580

60602 231730

JOSEPH YOUNES LAW OFFICES  
166 WASHINGTON ST  
CHICAGO, IL 60602

**Case law citations to the “Terri Schiavo”  
(aka: the Florida 'feeding tube girl') case**

## Exhibit-G

\* ***In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)***, No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)

<http://www.FloridaSupremeCourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

\* ***In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO, GUARDIAN: THERESA SCHIAVO***, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing. (Bush got 0.0% of his panel before the same court)

<http://www.FloridaSupremeCourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

\* ***Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo***, 403 F.3d 1223, 2005 WL 648897 (11<sup>th</sup> Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of their panel on the Federal Appeals level)

<http://Media.ca11.UsCourts.gov/opinions/pub/files/200511556.pdf>

## Exhibit-H

May 03, 2018 ruling **[Exhibit-H]**, that: “This court has no jurisdiction to order the Cir. Ct. to allow Watts leave to intervene, grant a fee waiver, or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572). Motion denied.  
IT IS SO ORDERED.

/s/ Justice Daniel J. Pierce,” **in spite of the fact that Appellate Courts have Rule 321 authority** to order a limited record on appeal—or to intervene, as allowable under *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984),...not to mention that this order wrongly denies the inherent Rule Rule 301 jurisdiction of the appeals court—and as allowable under SECTION 6, ARTICLE VI, **Constitution of the State of Illinois.**



FILED DATE: 2/27/2019 7:28 PM 2007CH29738

NO. 1-18-0572

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, Plaintiff	) Appeal from the Circuit Court of Cook County, IL
vs.	)
	) No. 07CR29738
	) (Transfer into Law Division from Chancery)
Gordon W. Watts, et. al., Defendants	)
	) Hon. James P. Flannery, Jr., Judge Presiding

**ORDER**

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for Summary Judgment, and, notice having been given, and the Court being ~~fully~~ advised in the premises:

**IT IS HEREBY ORDERED** that the ~~Circuit Court of Cook County shall vacate its order in GMAC Mortgage, LLC v. Watts, case No. 2007-CH-29738 (03/01/2018), denying Gordon Wayne Watts leave to intervene. The circuit court is instructed to grant Mr. Watts a Fee Waiver, and prepare the selected Record on Appeal items listed in Watts' draft order in his 03/16/2018 Motion for Extension of Time to file Record on Appeal in case no. 1-18-0091 and transmit the record to this court by electronic means.~~ *This Court has no jurisdiction to order the Cir. Ct. to allow Watts leave to intervene, grant a fee waiver or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572)*

~~The trial court shall speedily prepare the selected record, so notify this court, and transmit it to this court by electronic means, on accelerated docket.~~

*Motion Denied.*

IT IS SO ORDERED.

**ORDER ENTERED**

MAY 03 2018

APPELLATE COURT, FIRST DISTRICT

*James P. Flannery, Jr.*  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

Prepared by:  
Gordon Wayne Watts  
821 Alicia Road  
Lakeland, FL 33801-2113  
(863) 688-9880 (h), (863) 409-2109 (c)

THOMAS D. PALELLA  
CLERK OF THE APPELLATE COURT 1ST DISTRICT  
160 NORTH LASALLE STREET, RM 51400  
CHICAGO, ILLINOIS 60601

S SUBURBAN  
IL 604  
03 MAY '18  
PM 3L

FIRST-CLASS MAIL  
usps®  
05/03/2018  
US POSTAGE  
\$00.47  
ZIP 60601  
041L11249569

1-18-0572

GORDON WAYNE WATTS  
821 ALICIA ROAD  
LAKELAND FL 33801

*Rec'd*  
*Sat. 07 May 2018*  
*[Signature]*

33601-211321

041L11249569

## **Exhibit-I**

Docuemtation that defendant, Watts, timely documented that he qualifies to proceed as an indigent **(Exhibit-I)**, thereby showing that he could, legally, request This Court prepare the *entire* record on appeal, and transmit it to the appellate court for review. But, in the interests of fairness to the court (humane treatment and judicial economy), Watts notes that the size of the docket in the underlying Chancery case, in this case number, is huge, and would burden This Court to prepare.



## E-Notice

2007-CH-29738

CALENDAR: W

To: Gordon Wayne Watts  
gww1210@gmail.com

---

# NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC MORTGAGE LLC v. YOUNES JOSEPH  
2007-CH-29738

The transmission was received on 01/22/2018 at 6:33 PM and was ACCEPTED with the Clerk of the Circuit Court of Cook County on 01/23/2018 at 9:19 AM.

**MOTION (I filed this through Odyssey eFileL using only option available, but clerk returned it asking me to refile in Chancery. OK, I'm doing it now: This is case from Chancery transferred to Law Division.GW)**

**EXHIBITS (Exhibit #1, the email from your clerk asking me to refile - -see herewith.)**

**EXHIBITS (Exhibit #2: When I tried to do what I was told, Odyssey's options only had "county" dept, but nothing for Chancery case transferred into law division.)**

Filer's Email: gww1210@gmail.com  
Filer's Fax:  
Notice Date: 1/23/2018 9:19:58 AM  
Total Pages: 11

**DOROTHY BROWN**  
**CLERK OF THE CIRCUIT COURT**  
COOK COUNTY  
RICHARD J. DALEY CENTER, ROOM 1001  
CHICAGO, IL 60602

(312) 603-5031  
courtclerk@cookcountycourt.com

This form is approved by the Illinois Supreme Court and is required to be accepted in all Illinois courts.

For Court Use  
PAGE 1 of 9  
CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
LAW DIVISION  
CLERK DOROTHY BROWN

STATE OF ILLINOIS, CIRCUIT COURT <u>Cook</u> COUNTY		APPLICATION FOR WAIVER OF COURT FEES
<b>Instructions</b> ▼	<p>Enter above the county name where the case was filed.</p> <p>Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.</p> <p>Enter the name of the person being sued as Defendant/Respondent.</p> <p>Enter the Case Number given by the Circuit Clerk or leave this blank if you do not have one.</p>	
	<p>GMAC Mortgage, LLC aka "US Bank, NA," etc..</p> <p>Plaintiff / Petitioner (First, middle, last name)</p>	
	<p>v. Richard B. Damigelli, Gordon Wayne Watts, Joseph Yonnes, Paul L. Shelton, et. al.,</p> <p>Defendant / Respondent (First, middle, last name)</p>	
		<p>2007-CH-29738 LAW Division (Transfer from Chancery)</p> <p>Case Number</p>

In 1a, enter your full name. If you are completing this form on behalf of a minor or an incompetent adult, provide that person's information.

In 1b, only enter the year you were born. DO NOT enter your entire date of birth.

In 1c, enter your complete current address.

In 2a, enter the number of people age 18 and older living in your house who you support. Support means that the people rely on you financially.

In 2b, enter the number of people under age 18 living in your house who you support.

In 3, check "Yes" if you have received at least 1 of the benefits listed in the past 4 weeks.

If you check "Yes" in 3, skip 4 and sign the form.

Pursuant to Illinois Supreme Court Rule 298 and 735 ILCS 5/5-105, I state:

1. I am providing the following information about myself:

a. Name: Gordon Wayne Watts  
First Middle Last

b. Year of Birth: 1966

c. Street Address: 821 Alicia Road  
City, State, ZIP: LAKELAND, Florida 33801-2113

d. I believe I cannot afford to pay the court fees in this case.

2. I am providing the following information about people who live with me:

a. I support 0 adults (not counting myself) who live with me.

b. I support 0 children under 18 who live with me.

3. I have received 1 or more of the benefits listed below in the past 4 weeks:

Yes  No

- Supplemental Security Income (SSI) (Not Social Security)
- Aid to the Aged, Blind and Disabled (AABD)
- Temporary Assistance to Needy Families (TANF)
- State Children & Family Assistance
- Food Stamps (SNAP) ← Yes - See attached documentation
- General Assistance (GA)
- Transitional Assistance

\*\*If you answered "Yes" in section 3, skip section 4 and sign the form.\*\*

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

ELECTRONICALLY FILED  
1/22/2018 6:33 PM  
2007-CH-29738  
PAGE 2 of 9

Enter the Case Number given by the Circuit Clerk: 2007-CH-29738  
2007-CH-29738 LAW Division (Transfer

from  
Chorey)

In 4a, check "Yes" if you have applied for at least 1 of the benefits listed in section 3.

4. I checked "No" in section 3, so I am providing the following financial information:

a. I have applied for 1 or more of the benefits listed in section 3:

Yes  No

b. I receive the following money each month. This includes money received by people I

support who live with me. (check all that apply)

My employment: \$ \_\_\_\_\_  Other people's employment: \$ \_\_\_\_\_

Child support: \$ \_\_\_\_\_  Social Security (not SSI): \$ \_\_\_\_\_

Pension: \$ \_\_\_\_\_  Unemployment: \$ \_\_\_\_\_

Other (list type and amount): \_\_\_\_\_ \$ \_\_\_\_\_

No income

Total of all money received: \$ \_\_\_\_\_

c. I received the following total amount of money in the past 12 months. This includes money

received by people I support who live with me. (check all that apply)

My employment: \$ \_\_\_\_\_  Other people's employment: \$ \_\_\_\_\_

Child support: \$ \_\_\_\_\_  Social Security (not SSI): \$ \_\_\_\_\_

Pension: \$ \_\_\_\_\_  Unemployment: \$ \_\_\_\_\_

Other (list type and amount): \_\_\_\_\_ \$ \_\_\_\_\_

No income

Total of all money received: \$ \_\_\_\_\_

d. My current monthly expenses are listed below. This includes the monthly expenses of the

people I support who live with me. (check all that apply)

Rent: \$ \_\_\_\_\_ per month

Home Mortgage: \$ \_\_\_\_\_ per month

Other Mortgage: \$ \_\_\_\_\_ per month

Utilities: \$ \_\_\_\_\_ per month

Food: \$ \_\_\_\_\_ per month

Medical: \$ \_\_\_\_\_ per month

Car Loan: \$ \_\_\_\_\_ per month

Other (list type and amount): \_\_\_\_\_ \$ \_\_\_\_\_ per month

I have no expenses

Total of all expenses: \$ \_\_\_\_\_

In 4b, check the box for each type of money you have received in the past month. Also enter the gross (before taxes) amount for each type.

Include the money received by the people you support who live with you. Support means that the people rely on you financially.

In 4c, check the box for each type of money you have received in the past 12 months. For each type, enter the total amount received in the past 12 months before taxes.

Include the money received by the people you support who live with you.

In 4d, check all of your expenses for the past month and list the monthly amounts. Include the expenses of the people you support who live with you.

Enter the Case Number given by the Circuit Clerk:

2007-CH-29738  
2007-CH-29738 LAW Division (Transfer from Chancery)

In 4c, check all of the items owned by you and list the value of each item. Include the items owned by the people you support who live with you.

If you own real estate, include the total you owe on any mortgage.

e. I have the belongings listed below. This includes the belongings of the people I support who live with me. (check all that apply)

Bank accounts and cash totaling: \$ \_\_\_\_\_

Home real estate, worth: \$ \_\_\_\_\_

The total I owe on my home mortgage is: \$ \_\_\_\_\_

Other real estate, not including the house I live in, worth: \$ \_\_\_\_\_

The total I owe on my other mortgage is: \$ \_\_\_\_\_

1<sup>st</sup> vehicle worth: \$ \_\_\_\_\_ The 1<sup>st</sup> vehicle is paid off:  Yes  No

2<sup>nd</sup> vehicle worth: \$ \_\_\_\_\_ The 2<sup>nd</sup> vehicle is paid off:  Yes  No

Other (list items and value): \_\_\_\_\_ \$ \_\_\_\_\_

None of the above

I certify that everything above is true and correct to the best of my knowledge.

I understand that making a false statement in this form could be perjury.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

The person who filled out this form must sign it.

Enter the complete current address and telephone number of the person who filled out this form.

If you are filling out this form for a minor or an incompetent adult, state your relationship.

Gordon Wayne Watts  
Your Signature

821 Alicia Road  
Street Address

Gordon Wayne Watts  
Print Your Current Name

LAKELAND, FL 33801-2113  
City, State, ZIP

N/A  
Relationship to Minor or Incompetent Adult (if applicable)

(863) 688-9888 (Home)  
Telephone  
(863) 409-2109 (Cell)

ELECTRONICALLY FILED  
1/22/2018 6:33 PM  
2007-CH-29738  
PAGE 3 of 9

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

\_\_\_\_\_  
Plaintiff/Petitioner

v.

\_\_\_\_\_  
Defendant/Respondent

No. \_\_\_\_\_

Calendar \_\_\_\_\_

**ORDER**

This matter coming before the Court on an Application and Affidavit to Sue or Defend as an Indigent Person, the Court being fully advised in the premises, **IT IS HEREBY ORDERED;**

Pursuant to Supreme Court Rule 298 and 735 ILCS 5/5-105:

The applicant is permitted to sue or defend without payment of fees, costs or charges. Fees for the reproduction of any documents contained in the court file or the electronic docket are not waived without specific order of court. The applicant may be ordered to pay any portion of the waived fees or costs out of a settlement or judgment resulting from this action.

The application is denied for the following reason(s): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Payment shall be:  made by \_\_\_\_\_ (date) OR  deferred until \_\_\_\_\_ (date) OR  other \_\_\_\_\_

ENTERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge

\_\_\_\_\_  
Judge's No.

Payment should be made by cash, money order or cashier's check, directly to the Clerk of the Circuit Court of Cook County at the courthouse where you filed your application.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

ELECTRONICALLY FILED  
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2007-CH-29738  
PAGE 4 of 9



***GMAC v Daniggelis, Watts, Younes, et al., 2007-CH-29738 (Notice of Appeal)***

*From the Desk of: Gordon Wayne Watts*

821 Alicia Road – Lakeland, FL 33801-2113

H: (863) 688-9880 – C: (863) 409-2109 – W: (863) 686-3411 or: (863) 687-6141

Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@Gmail.com](mailto:Gww1210@Gmail.com)

Web: [www.GordonWatts.com](http://www.GordonWatts.com) / [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)

**Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division  
50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343

Re: “Waiver of Court Fees” confusion in this case

Friday, 19 January 2018

Dear Judge Flannery:

**It has come to my attention that there's confusion regarding my application for fee waiver. As you were the presiding judge who adjudicated my last application, it's instructive to revisit the issue:** We recall I was a prospective *Amicus Curiae* aka a “Friend of the Court,” and you denied my application on grounds that I wasn't a party. As much as I disagree, I admit this is a “gray” area of case law, & any review of it would be “*de novo*.” As such, there's a good argument that you were right in your order (dated Feb. 22, 2016, in the underlying Chancery case, which was transferred to the Law Division) denying me fee waiver. However, when speaking by phone with Pat O'Brien, deputy chief of Civil Appeals, she assured me that your denial of my application last time means that I must be denied now. **\*\*UPDATE\*\*** Correction—since writing this (in my last letter, which was Exhibit-D in my Notice of Appeal), I spoke with Ms. O'Brien, who says I misrepresented her view, as to why she disagrees with me. I think she simply thinks that I needed an explicit order—but she's wrong: *See the case-law below...*

My application for fee waiver this past Monday, 08 January 2018 (the day I filed my notice of appeal) was rejected because it was an 'Exhibit,' and had to have been a stand-alone filing, so I get a redo.

Anyhow, I mean no disrespect to Patricia—but here's my point: Since Ms. O'Brien is very intelligent (knowledgeable of Supreme Court rules, much more than her staff), if she can get confused, judges can also—after all, judges are human too. While you might've been right to deny me last time, things have changed. I asserted intervention (see my ***Motion to Intervene***, dated Thursday, 06 July 2017), an absolute right under IL case law: Where intervention as of right is asserted, “the trial court’s jurisdiction is limited to determining **timeliness, inadequacy of representation and sufficiency of interest**; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted.” ***City of Chicago v. John Hancock Mutual Life Ins. Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984)***. I satisfy all 3 requirements, giving me right to intervene under 735 ILCS 5/2-408(a) (3). As there was no denial of my motion, the docket's official listing of me as a defendant is *prima facie* evidence that I'm now a party, and thus qualify for fee waiver to sue or defend. (And, as I could sue Joe Younes anyhow, my cross-complaint and appeal constitutes suit, thus qualifying me.) Recall Rule 10-100(a) Illinois Supreme Court Commission on Access to Justice: “The Illinois Supreme Court Commission on Access to Justice is established to promote, facilitate, and enhance equal access to justice with an emphasis on access to the Illinois civil courts and administrative agencies for all people, **particularly the poor and vulnerable**,” which includes me. Therefore, my Notice of Appeal, and my Request for Preparation of the Record on Appeal, both *Sine Qua Non* necessary to grant me Due Process to proceed indigent in my appeal, require a grant of my request for a Fee Waiver. Otherwise, the injustices occurring in this case can not be reviewed on appeal. Unless your court awards me for my various losses, which I've documented in my Intervention Motion, I'll have sufficiency of interest & thus qualify to Intervene—and obtain fee waiver. This is IL case law; you may check to verify, but you must comply.

**With kind Regards, I am, Sincerely,**

/s/ Gordon Wayne Watts

**Gordon Wayne Watts**

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1/22/2018 6:33 PM  
2007-CH-29738  
PAGE 5 of 9

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**Prior Waiver denial before I was a party to the case (1 page)**

Order to Sue or Defend as an Indigent Person

CCG N689 C-30M-6/27/07

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC MORTGAGE, LLC et al.

Plaintiff/Petitioner

ATTY JOSEPH YOUNG, ESQ; MR. RICHARD S. DANIELS, et al.

Defendant/Respondent

No. 07 CT 29738

Calendar \_\_\_\_\_

**ORDER**

This matter coming before the Court on an Application and Affidavit to Sue or Defend as an Indigent Person, the Court being fully advised in the premises, IT IS HEREBY ORDERED;

Pursuant to Supreme Court Rule 298 and 735 ILCS 5/5-105;

The applicant is permitted to sue or defend without payment of fees, costs or charges. Fees for the reproduction of any documents contained in the court file or the electronic docket are not waived without specific order of court. The applicant may be ordered to pay any portion of the waived fees or costs out of a settlement or judgment resulting from this action.

The application is denied for the following reason(s): PETITIONER LACKS STANDING TO BRING SUIT ON BEHALF OF ANOTHER.

Payment shall be:  made by \_\_\_\_\_ (date) OR  deferred until \_\_\_\_\_ (date) OR  other \_\_\_\_\_

ENTERED:

JUDGE JAMES P. FLANNERY

FEB 22 2016

Circuit Court-1505

Dated: February 22, 2016

[Signature]  
Judge Judge's No 1505

Payment should be made by cash, money order or cashier's check, directly to the Clerk of the Circuit Court of Cook County at the courthouse where you filed your application.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORIGINAL - COURT FILE

**Prior Waiver denial before I was a party to the case (1 page)**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

ELECTRONICALLY FILED  
1/22/2018 6:33 PM  
2007-CH-29738  
PAGE 6 of 9

ACCESS CENTRAL MAIL CENTER  
P.O. BOX 1770  
OCALA FL 34478

**Notice of Case Action**  
State of Florida Department  
of Children and Families



December 7, 2017

Case: 1165166518

Phone: (407) 552-0396

GORDON W WATTS  
821 ALICIA RD  
LAKELAND FL 33801

Dear Gordon W Watts

The following is information about your eligibility.

**Food Assistance**

The following is information about your Food Assistance benefits:

Your Food Assistance benefits will increase as shown below due to a change in your household's circumstances.

Household Size: 1.

Name	Jan, 2018 Thru July 31, 2018
Gordon Watts	Eligible
<b>Benefit Amount</b>	<b>\$188.00</b>

Did you know you now have an on-line account with us? Go to [www.myflorida.com/accessflorida](http://www.myflorida.com/accessflorida). You will need your case number, 1165166518, to activate your My ACCESS Account. Then you can get into your account with a user name and password of your choice.

For Food Assistance benefits, the only change you must report during your certification period is when your household's monthly gross income is more than your income limit of \$1,307.00. You must report this change within 10 days following the end of the month the change happens. If your household income was higher than this amount at the time of your last application or review, you should report changes at the next review. If you fail to report changes as required, or if the information you provide is not correct, you may have to repay any benefits you receive for which you were not eligible and you may be prosecuted for fraud. You must report other changes and your household's situation at the time of the next recertification. If you have access to a computer, you may report your changes online at the ACCESS Florida website [www.myflorida.com/accessflorida](http://www.myflorida.com/accessflorida). You may also report changes by calling the ACCESS Florida Customer Call Center toll free at 1-866-762-2237, or by mail to the return address at the top of this notice.

The requirement to report changes for Cash and Medicaid benefits is different. If you are receiving either of those benefits, you must still report all changes in your household's circumstances within 10 days.

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 PAGE 8 of 9

Menu Food Assistance Details x +

dcf-access.dcf.state.fl.us/access/benefitDetails.do

www.youtube.com/us gww1210f gww1210g support1.microsoft.com www.microsoft.com/ks/gw00dani gww00dani gww00dani

If you are currently receiving regular food assistance benefits you are not eligible for D-SNAP (Food for Florida). Do not apply online or go to the site locations. If you try to apply for D-SNAP, you will be denied because you already receive food assistance benefits from SNAP.

- Regular food assistance recipients who live in the 48 counties approved for D-SNAP will have their household allotment increased to the maximum for September and October. The increase will bring them up to the total amount they would have received from D-SNAP, and will be credited to their EBT cards.
- The supplement is automatic. You do not have to do anything.
- The supplement will not be labeled in your MyACCESS Account.

### Food Assistance Details

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**Case Information**

<b>Case Number</b>	1165166518	<b>Head of the Household</b>	GORDON W. WATTS
--------------------	------------	------------------------------	-----------------

**Food Assistance Details**

Group No	Payee	Begin Date	End Date	Status	Monthly Amount	Benefit Month	Date Benefit Available	History Information
01	GORDON W. WATTS	01/01/2018	01/31/2018	OPEN	178			<a href="#">click here</a>
01	GORDON W. WATTS	12/01/2017	12/31/2017	OPEN	178	December, 2017	12/05/2017	<a href="#">click here</a>
01	GORDON W. WATTS	11/01/2017	11/30/2017	OPEN	179	November, 2017	11/05/2017	<a href="#">click here</a>

APPEAL TO THE APPELLATE COURT OF ILLINOIS FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, LAW DIVISION, First Municipal District, Calendar "W"

GMAC, et. al., Plaintiffs / Appellees Plaintiff/Appell

Daniggelis, Watts, v. Younes, et. al., Defendants / Appellants

Reviewing Court No.

Circuit Court No. 2007 - CH - 29738

Honorable Diane M. Shelley, Circuit Judge Trial Judge

Date Notice of Appeal Filed Monday, 08 January 2018

REQUEST FOR PREPARATION OF RECORD ON APPEAL

Attorney (or Party if no attorney):

Name: Mr. Gordon Wayne Watts Cook County Attorney Code No. 99500 or Pro Se 99500 Address: 821 Alicia Road, City: Lakeland State: Florida Zip: 33801-2113 Telephone Number: H: 863-688-9880 / C: 863-409-2109

Attorney for: Pro Se E-mail Address (optional) Gww1210@aol.com / Gww1210@Gmail.com Name of Party GordonWatts.com GordonWayneWatts.com

NOTICE IS HEREBY GIVEN to the Clerk of the Circuit Court of Cook County that Mr. Gordon Wayne Watts requests the preparation of the Record on Appeal in the above case.

DESIGNATION OF RECORD

The Clerk of the Circuit Court of Cook County shall prepare the Record on Appeal in accordance with Illinois Supreme Court Rule 321. The record on appeal shall include the common law record, which consists of trial documents filed and judgments and orders entered by the trial court and:

All documentary exhibits entered at trial, except for those other exhibits that cannot ordinarily be included for review and are subject to motion.

Reports of Proceedings prepared in accordance with Illinois Supreme Court Rule 323.

Certificate in Lieu of Record on Appeal pursuant to Illinois Supreme Court Rule 325.

Documents filed under seal on the following dates and unsealed:

A copy of the trial court Order authorizing these documents to be unsealed for the purpose of inclusion in the Record on Appeal is attached hereto or will be provided by the Appellant to the Civil Appeals Division at least 30 days in advance of the date on which the Record on Appeal is scheduled to be transmitted to the Appellate Court. Upon return of the Record on Appeal to the Circuit Court, it is the responsibility of the parties to obtain an Order resealing these records, if the records are to be resealed.

Documents filed under seal on the following dates, which are to remain sealed:

Please note that, pursuant to Rule 17 of Appellate Court of Illinois, "No record, exhibit, or brief may be filed under seal in the Appellate Court, unless Appellate Court has first given leave for filing under seal, notwithstanding that the material was filed under seal in the Circuit Court."

FEES

Payment may be made by Cash, Check or Money Order. Cash payments accepted for in-person payments only. Checks or money order should be made to Clerk of the Circuit Court of Cook County. Pursuant to 705 ILCS 105/27.2a(k) and 27.2(k), the Clerk of the Circuit Court of Cook County must charge fees for Records on Appeal in advance as follows:

100 pages or less, \$110

100 - 200 pages, \$185

Each page in excess of 200, \$.30/page

Reduced fee for Local Governments and School Districts, \$50

All prescribed fees are due in advance of transmission of the Record on Appeal. It is understood and agreed that once a request for preparation of a Record on Appeal is made by submission of this form, the Appellant is responsible for the costs of preparing the Record on Appeal, regardless of whether the Appeal is successful, dismissed, the time is extended, or a party elects to not transmit the Record on Appeal to the Appellate Court. The Clerk of the Circuit Court of Cook County reserves the right to pursue a claim to recover the costs and expenses, including reasonable attorneys' fees, related to preparation of the Record on Appeal.

Mr. Gordon Wayne Watts

(Type or print name)

(Signature of Appellant or Appellant's Attorney)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

MONDAY, 08 January 2018

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2007-CH-29738  
CALENDAR: W  
PAGE 1 of 1  
Gordon Watts <gww1210@gmail.com>  
CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
LAW DIVISION  
CLERK DOROTHY BROWN



**Filing Returned for Envelope Number: 423515 in Case: 2007-CH-29738, for filing 298 Petition**

no-reply@tylerhost.net <no-reply@tylerhost.net>  
To: gww1210@gmail.com

Mon, Jan 22, 2018 at 10:26 AM



**Filing Returned**

Envelope Number: 423515  
Case Number: 2007-CH-29738  
Case Style:

The filing below has been reviewed and has been returned for further action. **Please refile with the corrections outlined below.** Please, contact the appropriate court help center for further information.

Return Reason(s) from Clerk's Office	
<b>Court</b>	Cook County - County Division
<b>Returned Reason</b>	Incorrect Venue
<b>Returned Comments</b>	You must file in Chancery

Document Details	
<b>Case Number</b>	2007-CH-29738
<b>Case Style</b>	
<b>Date/Time Submitted</b>	1/19/2018 11:35 PM CST
<b>Filing Type</b>	EFile
<b>Filing Description</b>	2007-CH-29738, GMAC v Richard B. Dangelis, Gordon Wayne Watts, Joseph Younes, Paul L. Shelton, et. al., a LAW Division case, transferred from Chancery, and being appealed. I was told by Civil Division Deputy Chief, Patricia O'Brien, that my Application for Fee Waiver had to be a seperate filing, not an exhibit, so here you go.:) Gordon//
<b>Activity Requested</b>	298 Petition
<b>Filed By</b>	Gordon Watts
<b>Filing Attorney</b>	

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



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CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
LAW DIVISION  
CLERK DOROTHY BROWN

## File Into Existing Case

### Select a Location

#### Location

Cook County - County Division - District 1

Clay County

Clinton County

Coles County

Cook County - County Division - District 1

Crawford County

Cumberland County

Search Clear Search

\* NOTE: I just filed my 298 petition with Odyssey, in envelope number 423515 (for case 2007-CH-29738, GMAC v Daniggelis, Watts, et al., which was transferred from Chancery to Law), but it was returned with a claim I filed in the wrong venue, and to file in Chancery.

\* However, as you can see, Odyssey, the official eFiling provider for Illinois Courts, does NOT have any option for Cook County, IL, except what is shown. Therefore, I am forced to file with another eFile provider, who charges.

Gordon Wayne Watts  
Monday, 22 January 2018



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# Law DIVISION

## Litigant List

Printed on 01/23/2018

Case Number: 2007-CH-29738

Page 1 of 2

### Plaintiffs

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GMAC MORTGAGE LLC			0000	
BANK AMERICA NA			0000	
CHICAGO VOLUNTEER LEGAL			0000	
LASALLE			0000	
US BANK NATIONAL ASSOCI			0000	

Total Plaintiffs: 5

### Defendants

Defendant Name	Defendant Address	State	Unit #	Service By
DANIGGELIS RICHARD			0000	
GORDON WAYNE WATTS			0000	
HLB MORTGAGE			0000	
INVEST ONE			0000	
LAROCQUE JOHN			0000	
LEGATEES			0000	
MOORE ROBERT			0000	

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MORTGAGE ELECTRONICS RE	0000
NON RECORD CLAIMANTS	0000
PHONE ERIKA	0000
SHELTON PAUL	0000
STEWART TITLE ILLINOISZ	0000
TRUST ONE MORTGAGE	0000
UNKNOWN HEIRS	0000
UNKNOWN OWNERS	0000
YOUNES JOSEPH	0000

Total Defendants: **16**

## **Exhibit-J**

**The 10-17-2018 “Motion – *En Banc* – for Extension of Time to file Record on Appeal,” in this case number, which the reviewing court granted **(Exhibit-J)**.**

**In the Appellate Court of Illinois, First District**

**Docket Number: 1-18-0091**

**GMAC Mortgage, LLC,** ) Appeal from the Circuit Court of Cook County, IL  
**Plaintiffs,** ) County Department, Law Division  
**vs.** )  
 ) **Circuit Court Case No.:** 2007-CH-29738  
**Gordon Wayne Watts, et. al.,** ) (Transfer into **Law Division** from Chancery)  
**Defendants.** )  
 ) **Trial Judge:** Hon. Diane M. Shelley (#1925)  
 ) **Notice of Appeal date:** Monday, 08 January 2018  
**Gordon Wayne Watts,** ) **Judgment Date:** Wednesday, 07 December 2017  
**Appellant/Counter-Plaintiff,** ) **Date of Post-judgment Motion:** None  
**vs.** ) **Order:** #5  
**Joseph Younes, Hon. Diane M. Shelley,** )  
**Hon. James P. Flannery, et al.,** ) Supreme Court Rule(s) which confer(s) jurisdiction  
**Counter-Defendants.** ) upon the reviewing court: **Ill.Sup.Ct. R.301, 303**

**Motion – En Banc – for Extension of Time to file Record on Appeal**

This matter comes before the Court on motion of Movant for extension of time to file the Record on Appeal.

**Rule 326 addresses circumstances such as this:** “Extensions of time for filing the record may be granted **by the reviewing court** or a judge thereof on motion made before the expiration of the original or extended time **or on motion filed within 35 days thereafter supported by a showing of reasonable excuse for failure to file the motion earlier.** The movant shall serve any motion for extension of time on the clerk preparing the record on appeal.” [Movant is doing so – see e.g., Service List.] Although the prior 2 motions for extension of time (on 3/16/2018 and 7/18/2018) were “late” insofar as they fell within the 35-day grace period provided by R.326, today’s motion is timely, to show proper respect for The Court and all parties: The July 25, 2018 order extended time to October 17, 2018, which is today, and thus not late. [This motion also seeks an *En Banc* reviewing court review, as the title indicates.]

**The gravity of the case should be mentioned, first, as a recap, since a lot is at stake:** [#1] Not only was a house taken from one elderly defendant, via title-theft, but he also lost hundreds of thousands of dollars of equity and was made homeless, all without getting paid a dime—and (most-importantly) no court has been able to “show cause” why this was legal, and the undersigned, in prior pleadings, even quoted Judge Otto’s 3/8/2013 ruling in the underlying Chancery case, in the which this associate judge, in so many words, admitted the existence of duplicate signature forgery fraud (which is a felony). Were this case to not be overturned & remanded, a grave injustice would be done, not even including [#2] the loss of interests by Intervenor, Gordon W. Watts, who has documented his vast interests (in his 7-7-2016

Intervention motion in the law division case), in that he is (similar to a mechanic's lien) owed large sums of monies. [#3] Lastly, This Court has—no disrespect meant—committed Clear Error and Manifest Error in its recent rulings, prompting motions in all 3 sister cases (1-18-0091, 1-18-0538, and 1-18-0572). Great harm would be done for *any* of the 3 reasons cited above, and grave harm for all three.

While Movant, Watts, is not an attorney, he nearly won the largest case in the last century—all by himself—doing better, even than then Gov. Jeb Bush, before the same panel, which may be verified by looking at that court's docket:

**\*\* In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)**, No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel) <http://www.FloridaSupremeCourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

**\*\* In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO, GUARDIAN: THERESA SCHIAVO**, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing. (Bush got 0.0% of his panel before the same court) <http://www.FloridaSupremeCourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

This would suggest that Watts' filings, and sincere allegations of grave missteps, may have some merit, and should be reviewed *En Banc*.

The mitigating circumstances which delayed filing of the Record on Appeal (some the fault of the court below, and some family-emergencies, which were unforeseen, and not the fault of Movant) were described in prior filings, and This Court graciously granted 2 extensions of time to file the record.

**Reasons for Delay in filing the Record on Appeal:** Movant, whose father recently passed away, received a very small inheritance, and had intended to use several thousand dollars of his own monies to pay for the Record on Appeal, since This Court (and the courts below) refused to grant a R.321 motion to limit the record to a manageable size, which Movant was willing to pay. However, right when he was about to do so, some crazy person drilled a half-inch drill into his vehicle's gas tank (presumably to steal gas, but this is very dangerous, risking a spark-induced explosion, which is why the adjective “crazy” was used in a legal filing above). This unforeseen turn of events (see EXHIBIT-A, police report) prompted Movant to upgrade his security system, which cost untold thousands of dollars, leaving Movant almost broke. (See EXHIBIT-B, bank records) Then, even if he would, otherwise, have been looking for a job, he was served an eviction notice (see EXHIBIT-C). Having to move mountains of personal belongings to help his mother move (she resides with him, in the wake of the death of Movant's father), precludes him from holding down a job for a few months, and this does not even account for the fact that he was working part-time for his father, who is now dead, and can no longer contribute charitable donations for part-time work. Thus, Movant is indigent within the meaning of Rule 311(a), and, as proof of that, This Court granted permission to proceed without payment of fees. But, since the lower courts did not obey the law (the same law governs both courts)m

and because Movant no longer had the several thousand dollars to prepare the “full” record—and because both the trial court and This Court refused a R.321 motion to limit the record to only that which was needed—something Movant might have been able to afford (as it was likely only several hundred dollars, not the estimated 2 or 3 grand for this very huge Record), the Due Process of this case ground to an abrupt halt. (The courts priced out the Movant, unable to pay an unreasonable fee, and thus no Record was prepared.)

This Court may wonder if Movant has made genuine attempts to prosecute this appeal. However, in communications with the Civil Appeals Division, Atty. Patricia A. O'Brien, Esq., Chief Deputy Clerk of that division, admitted that Movant had made many attempts to procure the record, in her email to the undersigned, when she said: “Good Morning Gordon, [line-break] As you know from our numerous prior discussions, the Civil Appeals Division does not prepare Records on Appeal unless the Request for Preparation of Record on Appeal form has been e-filed and the statutory fee paid.” (See EXHIBIT-D for O'Brien comments, and EXHIBIT-E for full thread)

This shows Movant was making genuine attempts to prosecute appeal, in spite of financial hardship. Her claims, however, that: “The Record on Appeal in this case will not be prepared by this Wednesday because you never filed your Request form,” are incorrect, as is documented in the follow-up replies (see EXHIBIT-E for full thread).

This Court is asked to extend the time to file the Record on Appeal, for those reasons above.

However, absent a miracle, no amount of time would be sufficient because Movant genuinely qualifies for indigent status, and thus court's denial of some amenities denies his day in court. Since it appears very unlikely that Daniggelis' attorney (Andjelko Galic) will refile the case by the statutory deadline in a few weeks (Judge Shelley granted his non-suit motion for voluntary dismissal with leave to refile within a year, in her 12/07/2017 Order), Movant's case is the only hope to get justice for both Movant (who has interests) and Daniggelis (the elderly fellow whose house/land & hundreds of thousands of documented dollars were stolen via title-theft mortgage fraud, and thereby made homeless). Moreover, This Court (in its June 16, 2016 Order, in file #:1-14-2751, a sister-appeal) royally chewed out Atty. Galic for his repeated failure to prosecute Daniggelis' appeal. Thus, it seems highly unlikely that Daniggelis (or Watts) will get justice if Watts' appeal is stricken or otherwise denied.

It is not without moment that This Court (in its 05/03/2018 Order in 1-18-0572, claimed that it lacked jurisdiction: “to allow Watts leave to intervene, grant a fee waiver, or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572). Motion denied.” (Hon. Daniel J. Pierce, JUSTICE, for the Court) That violates well-settled case law on Intervention by this Court (***City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984)**), as well as Rule 321, which expressly permits This Court to limit the record on appeal. While reasons may exist to demand a full record (perhaps This Court feels it needs the information), it is patently wrong to claim that This Court lacks appellate jurisdiction (both in

general, and as specifically granted by the case-law or Supreme Court rules above). Likewise, This Court (in its 09/28/2018 Order in 1-18-0538) claimed that: “this Cause is DISMISSED for lack of this Court's jurisdiction.” (Hon. Mary Anne Mason, Hon. Terrence J. Lavin, Hon. Michael B. Hyman, JUSTICES, for The Court) This clearly violates the ILLINOIS Constitution, which does indeed, grant This Court jurisdiction to entertain a Mandamus petition: SECTION 6 (APPELLATE COURT – JURISDICTION) of the IL Constitution expressly provides authority here in sentence 3 of that paragraph: “The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review,” which, of course, includes Mandamus actions. In fact, This Court, in permitted (and granted) Mandamus petitions in no less than *Gassman v. THE CLERK OF THE CIRCUIT COURT OF COOK COUNTY* (1-15-1738) *Midwest Medical v. Dorothy Brown* (1-16-3230). How is this so, if This Court lacks jurisdiction over Mandamus actions? (*Ironically, these were 'Fee Recovery' cases, not unlike this case, insofar as Movant is being asked to pay enormously large Preparation of the Record on Appeal fees for which he is exempt, as his rights to Intervene and indigent status qualify him.*)

Then, in its earlier order on 08/28/2018, This Court (Hon. Daniel J. Pierce, Hon. Mary L. Mikva, Hon. John C. Griffin, JUSTICES, for The Court) dismissed 1-18-0572, the sister case, which appealed the Circuit Court's denial of fee waiver for preparation of the record. Since the court asked appellant to do the very thing he was appealing, this was a **“Catch-22” gotcha ruling, denying Due Process**. The Record on Appeal can't be prepared via Fee Waiver without winning the appeal. But the appeal can't proceed without prep of the very huge record, which was entirely unnecessary to address the simple question at law, here: Whether the lower courts erred in denying Intervention and therefore ruled appellant wasn't a party, entitled to fee waiver. In light of the other two rulings, which violate clear law, this is troubling.

In its 03/28/2018 Order, in 1-18-0091, This Court ordered appellant to: “direct inquiries on the content of the record on appeal to the Clerk of the Circuit Court of Cook County,” which he did in his 04/20/2018 filing before Judge Shelley. However, not only did she not enter an order granting procedural due process (namely, this motion asked for a R.321 order to limit the record to that which appellant could afford, as that was all that was needed), she did not enter an order at all. This was an additional, and grave, Due Process violation, as the judge clearly got the filing, the court stamp in it as proof. This filing is available from the lower court, or on Appellant's own online docket, directly linked here below – and included as EXHIBIT-F, below:

\*\*[https://GordonWatts.com/MortgageFraudCourtDocs/Fri20Apr2018\\_MotionClarification\\_07CH29738\\_LawDiv\\_Watts.pdf](https://GordonWatts.com/MortgageFraudCourtDocs/Fri20Apr2018_MotionClarification_07CH29738_LawDiv_Watts.pdf)

or:

\*\*[https://gordonWAYNEwatts.com/MortgageFraudCourtDocs/Fri20Apr2018\\_MotionClarification\\_07CH29738\\_LawDiv\\_Watts.pdf](https://gordonWAYNEwatts.com/MortgageFraudCourtDocs/Fri20Apr2018_MotionClarification_07CH29738_LawDiv_Watts.pdf)

**ARGUMENT:** While courts are composed of judges and justices, who are human, and it is inappropriate to make fun of anyone's honest mistakes, nonetheless, the grave injustices above warrant an *En Banc* review. Indeed, the laws (case-law, Constitutional Law, Supreme Court rules, etc.) are “law,” and the courts should obey the law. On the other hand, when laws are enacted, it matters not whether they're “tall laws,” “short laws,” “fat laws,” or “skinny laws”: If

the laws are not obeyed and complied with by the sitting judiciary, this brings great dishonour and frustration to the court and litigants. Since Movant, tho indigent, has been shelling out big bucks to keep this appeal alive, and is willing to pay something, even tho he feels that he qualifies for a full “free scholarship” on Fee Waiver, This Court should recognise that Movant is making an honest effort to meet the court and parties halfway, and make their jobs as easy as possible. In fact, since the case for Summary Judgment, returning ownership of Daniggelis' house is so strong, This Court might save itself some time, headache, & man-hours, by simply ordering the limited record suggested in prior filings, and then issuing summary judgment on this case, and, more generally, reviewing policy on the missteps that occurred above, when the court did not comply with clearly-established Rules, case-law, Constitutional Provisions, etc.

Although it seems unlikely that Appellant, who is quite financially strapped, could pay the estimated several-thousand-dollar Record on Appeal fees to prepare the record, were he to somehow do so, he would be entitled to Mandamus relief, as the case-law above hold, and Mandamus would issue (from This Court or The IL Supreme Court) to compel reimbursement, because he qualifies for intervention, and (via poverty) for Fee Waiver. So, that being the case, why not grant relief now, so that we avoid that legal train wreck?

**This Court also violated a direct command of the Illinois Supreme Court, here recently, in a related case:**

[Date: 5/6/2015] No. 118434 - GMAC Mortgage, LLC, et al., respondents, v. Richard Daniggelis, petitioner. Leave to appeal, Appellate Court, First District. (1-14-2751)

Petition for leave to appeal denied.

In the exercise of this Court's supervisory authority, the Appellate Court, First District, is directed to vacate its order in GMAC Mortgage, LLC v. Daniggelis, case No. 1-14-2751 (09/24/14), denying Richard Daniggelis leave to file a late notice of appeal. The appellate court is instructed to allow Richard Daniggelis to file a late notice of appeal and hear the case. (27 N.E.3d 610 (2015))

**Let's looks again at the ORDER rendered here:** Notice that it doesn't say “hear” the case only if Atty. Galic files his merits briefs. Notice, please, it says to “hear the case.” Period. Now, no one will hold it against the appellate court judges for being human and getting side-tracked: **If This Court does not obey The Supreme Court's last order to hear the merits, four (4) parties will suffer harm:**

- (1) This Court will risk censure, embarrassment, & failure to obey the IL Supreme Court.
- (2) Mr. Daniggelis, who is elderly (about 80 or 81 at this time), was made homeless, *via title theft*.
- (3) Movant is owed monies as documented in Intervention filings, which need to be paid.
- (4) The Rule of Law would suffer, and who else would get denied a fair hearing, simply because he's a poor, out-of-state non-Lawyer?

**Conclusion:**

Movant is grateful for the kind patience of This Court in extending time twice already, but a failure to uphold the law for poor litigants who qualify for (because they can't afford) a Record on Appeal—and who legally (and morally) qualify for Intervention, would moot any extension of time. Therefore, This Court should review the record, and—on its own motion—permit a fair review of the merits of the case being appealed (whether it requires full prep of the Record or a limited R.321 Record as Movant suggests in prior filings).

There were so many blatant and obviously huge errors committed by This Court in the 3 sister-cases referenced (1-18-0091, 1-18-0538, and 1-18-0572), than an En Banc reconsideration is the only appropriate course to avoid a legal train wreck.

This Court might disagree with the requests made of it or disagree with the claims that This Court violated the law—and no disrespect is meant—but, if This Court disagrees with the legal analyses and/or the requests within the “four corners” of this brief, it should enlighten those on the outside as to why we are wrong via a clearer opinion, *En Banc*, after careful review.

Hopefully, however, the meager requests made with genuine intent to get justice, but not go overboard or destroy those who broke the law & executed title-theft, should be amenable to This Court, and to that end, Movant (supported by many others who are harmed by these title-theft thieves) moves This Court to execute justice after a careful review of the merits.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: Wednesday, 17 October 2018

*/s/Gordon Wayne Watts*  
**Gordon Wayne Watts**



**INDEX TO THE EXHIBITS**

<b><u>Instrument</u></b>	<b><u>Docket/Tab#</u></b>
** Police Report of vandalism, costing Appellant thousands of dollars	Exhibit-A
** Banks Records documenting claims of huge financial costs from this	Exhibit-B
** Eviction Notice & e-mail convo with Landlord	Exhibit-C
** Email convo with Civil Appeals Division documenting continued efforts of Appellant to Prepare the Record on Appeal	Exhibit-D
** Full thread of above conversation, including clerk of one judge	Exhibit-E
** Motion to lower court to prepare the record, and to limit the record via a Rule 321 motion, since record is very huge (according to both Dep. Clerk, Patricia O'Brien, who described it as "boxed" and Appellant, Watts, who described the enormously large docket posted by the clerk's office—which motion was court-stamped, docketed, and ignored by the circuit judge & not ruled on—at all.	Exhibit-F
** Last-known email addressed of Erika R. Rhone, one of the parties	Exhibit-G
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** E-mail exchange between Appellant and Attorney Carry Dolan, wherein she offers proof that their client has gotten leave of the court to withdraw, and asking Appellant to remove her from the Service List—which request was granted as it was properly-placed	Exhibit-I

NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC,	) Appeal from the Circuit Court of Cook County, IL
Plaintiff	)
vs.	) No. 07 CH 29737
	) <b>(Transfer into <u>Law</u> Division from Chancery)</b>
Gordon W. Watts, et. al.,	)
Defendants	) Hon. Diane M. Shelley, Judge Presiding

**ORDER**

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for an extension of time, and, notice having been given, and the Court being fully advised in the premises:

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to February 18, 2019, and, pursuant to **Rule 311(b)** [Rule 311. Accelerated Docket, (b) Discretionary Acceleration of Other Appeals], this appeal is placed on accelerated track. Pursuant to Rule 311(b), “The motion [to expedite] shall be supported by an affidavit stating reasons why the appeal should be expedited,” and This Court notes that both the instant motion and prior pleadings by Appellant had either 'Verification' affirmations, or actual Sworn/Notarized affidavits, which compel The Court to accept at face value allegations that an accelerated appeal is necessary. [This court notes that Watts' claims on this head were never challenged as false.]

**IT IS FURTHERMORE ORDERED** that the trial court shall grant Movant's motion for Intervention, Grant his application for fee waiver, and prepare 'selected' items described below:

This court finds, per Rule 311(b), that it is warranted by the circumstances, and This Court now enters a ruling that the trial court prepare only the following supporting record prepared pursuant to Rule 328, consisting only the following lower court pleadings:

- **All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts**
- **The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC**
- **The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis**
- **The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis**
- **Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008**
- **The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis**
- **The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto**
- **The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]**
- **The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis**
- **The 12/06/2017 Motion to Comply filed by Robert J. More**
- **The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**ORDER** – *GMAC v. Watts, et al.*, 1-18-0091 (ILLINOIS First Appellate Court)

**The trial court shall** prepare the Record on Appeal, with ONLY the items listed above (all the enumerated items, and ALL pleadings and related exhibits filed by Appellant, Gordon Wayne Watts), **and shall** place preparation of the selected records on “accelerated” track, **and shall** notify This Court when the record is prepared, **and transmit it instanter to This Court.**

After This Court makes the “selected” Record on Appeal, above, available to all litigants, it shall give ALL named parties ONE last opportunity, within thirty (30) days, to respond and to include anything relevant in the record (to make up for anything that was omitted for the sake of brevity), and to file ONE supporting brief, which complies with page and word-length requirements, citing to any supplemental record items.

Since the 'Record on Appeal' shall be less than 100% of the total record (due to time and space constraints), This Court deems it necessary, to satisfy Due Process, to give ALL parties opportunity to respond, and then This Court shall, if no counter arguments are raised, return Richard Daniggelis' house to him, with equitable damages awarded, by Summary Judgment. The “last chance” to file a brief, to grant fair Due Process to defendants, Joseph Younes, and other named defendants, shall be considered a chance to reply to a “Show Cause” order, This Court asking litigants to show cause why Daniggelis' house should not return to him.

Whether or not litigants file an 'answer' brief (this is optional), This Court **shall** review The Record (and any “one-time” briefs, submitted, as described above), **shall** consider the facts and law, **and shall render a decision**, in compliance with the 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))].

**The trial court shall speedily prepare the selected record, notify this court, and transmit it to this court by electronic means, on accelerated docket.**

**IT IS SO ORDERED.**

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

Prepared by:  
Gordon Wayne Watts  
821 Alicia Road  
Lakeland, FL 33801-2113  
(863) 688-9880 (h), (863) 409-2109 (c)

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**In the Appellate Court of Illinois, First District**

**Docket Number: 1-18-0091**

<b>GMAC Mortgage, LLC,</b>	) Appeal from the Circuit Court of Cook County, IL
<b>Plaintiffs,</b>	) County Department, Law Division
<b>vs.</b>	)
	) <b>Circuit Court Case No.:</b> 2007-CH-29738
<b>Gordon Wayne Watts, et. al.,</b>	) (Transfer into <b>Law Division</b> from Chancery)
<b>Defendants.</b>	)
<hr/>	) <b>Trial Judge:</b> Hon. Diane M. Shelley (#1925)
<b>Gordon Wayne Watts,</b>	) <b>Notice of Appeal date:</b> Monday, 08 January 2018
<b>Appellant/Counter-Plaintiff,</b>	) <b>Judgment Date:</b> Wednesday, 07 December 2017
<b>vs.</b>	) <b>Date of Post-judgment Motion:</b> None
	) <b>Order:</b> #5
<b>Joseph Younes, Hon. Diane M. Shelley,</b>	)
<b>Hon. James P. Flannery, et al.,</b>	) Supreme Court Rule(s) which confer(s) jurisdiction
<b>Counter-Defendants.</b>	) upon the reviewing court: <b>Ill.Sup.Ct. R.301, 303</b>

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**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, Wednesday, 17 October 2018, I am causing to be filed with the ILLINOIS 1<sup>st</sup> Appellate Court my Motion for Extension of Time, Verification by Certification, Exhibits –with an Index to exhibits, Proposed Order, this NOTICE OF FILING, an updated/corrected SERVICE LIST, and my Certificate of Service, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**SERVICE LIST**

\* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601 (312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays [**served by eFiling only, since this The Court no longer accepts paper filings**]

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays

\* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602, Courtesy copy via: [Timothy.Evans@CookCountyIL.gov](mailto:Timothy.Evans@CookCountyIL.gov) [**served, as a courtesy, since he is not a party proper**]

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) [**served, as Judge Flannery is a defendant in the Mandamus proceedings**]

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) [**served, as Judge Shelley is a defendant in the Mandamus proceedings**]

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

\* **Richard B. Daniggelis** (who receives mail, via USPS mail-forwarding at his old address) 1720 North Sedgwick St., Chicago, IL 60614-5722 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

\* **Andjelko Galic** (Atty. for Richard B. Daniggelis) (Atty#:33013) C:312-217-5433, Fx:312-986-1810, Ph:312-986-1510, [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ; [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) 845 Sherwood Road, LaGrange Park, IL 60526-1547

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

**SERVICE LIST (continued)**

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>  
312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E:  
[RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **Paul L. Shelton, Pro Se**, (Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ;  
[PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291, last known emails (see **Exhibit-G**) are as follows: [ERRegi@mail2.tread.net](mailto:ERRegi@mail2.tread.net), [Erika.Rhone@SbcGlobal.net](mailto:Erika.Rhone@SbcGlobal.net),  
[Erhone@Mindspring.com](mailto:Erhone@Mindspring.com), [Erika@GrandKahn.com](mailto:Erika@GrandKahn.com), [ErikaRhone@sbcglobal.net](mailto:ErikaRhone@sbcglobal.net),  
[ER5526199@aol.com](mailto:ER5526199@aol.com) and per: [https://www.FastPeopleSearch.com/ms-erika-r-rhone\\_id\\_G-5317261083665188477](https://www.FastPeopleSearch.com/ms-erika-r-rhone_id_G-5317261083665188477)

\* **Rosa M. Tumialán** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) (312) 876-1700, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300 Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Dawn Williams** ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)) ([DPeacock@KentLaw.iit.edu](mailto:DPeacock@KentLaw.iit.edu)) Note: Served to work address, as she has NOT been excused by Court as an attorney of record—but not served to personal email, as a courtesy, as she claims, via auto-responder email, to no longer work at DYKEMA. Phone: 616-776-7518, DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Atty. Justine A. Lewis, Esq.** ([JLewis@Dykema.com](mailto:JLewis@Dykema.com)), Senior Manager, Recruiting and Professional Development \*\* Note: Now included on service list per official email from Dykema – see **Exhibit-H**. Phone: 312-876-1700, FAX: 866-771-2154 or 312-876-1155, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300, Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX] Chicago office address per: <https://www.Dykema.com/www.dykema.com/careers-associates-opportunities.html>

**SERVICE LIST (continued)**

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 **[[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]**

\* **Associated Bank, N.A.**, 200 North Adams Street, Green Bay, WI 54301-5142  
Web: <https://www.AssociatedBank.com/about-us> PH: (920)433-3200, (800)236-8866, or (800)682-4989, Email address: [WeCare@associatedbank.com](mailto:WeCare@associatedbank.com) per: view-source:<https://www.AssociatedBank.com/contact> and: [ShareHolders@AssociatedBank.com](mailto:ShareHolders@AssociatedBank.com) per: <http://Investors.EquityApartments.com/drip.aspx?iid=100135> and [ColleagueCare@AssociatedBank.com](mailto:ColleagueCare@AssociatedBank.com) per: <https://AllHispanicJobs.com/s/find-associated-bank-jobs-in-usa>

\* **MERS (Mortgage Electronic Registration Systems, Inc.)** <https://www.MersInc.org/about-us/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and Corporate Secretary for MERSCORP Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**  
Removed from service list, and not served, as the court excused them as parties—see **Exhibit-I**.

\* **Stewart Title, Attn: Leigh Curry**  
Removed from service list, and not served, as the court excused them as parties—see **Exhibit-I**.

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 **[[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court.]]**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**In the Appellate Court of Illinois, First District**

**Docket Number: 1-18-0091**

<b>GMAC Mortgage, LLC,</b>	) Appeal from the Circuit Court of Cook County, IL
<b>Plaintiffs,</b>	) County Department, Law Division
<b>vs.</b>	)
	) <b>Circuit Court Case No.:</b> 2007-CH-29738
<b>Gordon Wayne Watts, et. al.,</b>	) (Transfer into <b>Law Division</b> from Chancery)
<b>Defendants.</b>	)
<hr/>	
<b>Gordon Wayne Watts,</b>	) <b>Trial Judge:</b> Hon. Diane M. Shelley (#1925)
<b>Appellant/Counter-Plaintiff,</b>	) <b>Notice of Appeal date:</b> Monday, 08 January 2018
<b>vs.</b>	) <b>Judgment Date:</b> Wednesday, 07 December 2017
	) <b>Date of Post-judgment Motion:</b> None
	) <b>Order:</b> #5
<b>Joseph Younes, Hon. Diane M. Shelley,</b>	)
<b>Hon. James P. Flannery, et al.,</b>	) Supreme Court Rule(s) which confer(s) jurisdiction
<b>Counter-Defendants.</b>	) upon the reviewing court: <b>Ill.Sup.Ct. R.301, 303</b>

**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

\* The undersigned **Defendant-Appellant, Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Motion for Extension of Time, Verification by Certification, Index to exhibits, Proposed Order, NOTICE OF FILING, an updated/corrected SERVICE LIST, and this Certificate of Service, and attached EXHIBITS**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – **today, this Wednesday, 17 October 2018**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.

\* I am NOT any parties via **First Class U.S. Postal Mail** –*as I customarily do (due to financial constraints), as Rule 11 does not require hard-copy service if email is used.*

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings –**online at my official websites, infra** –linked at the “Mortgage Fraud” story, dated Fri. 14 April 2017—see e.g., the “Open Source Docket” link in said news item.

\* Lastly, I am concurrently effecting service via **e-mail**. ***Respectfully submitted,***

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

*/s/ Gordon Wayne Watts*  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)



**INDEX TO THE EXHIBITS**

<b><u>Instrument</u></b>	<b><u>Docket/Tab#</u></b>
** Police Report of vandalism, costing Appellant thousands of dollars	Exhibit-A
** Banks Records documenting claims of huge financial costs from this	Exhibit-B
** Eviction Notice & e-mail convo with Landlord	Exhibit-C
** Email convo with Civil Appeals Division documenting continued efforts of Appellant to Prepare the Record on Appeal	Exhibit-D
** Full thread of above conversation, including clerk of one judge	Exhibit-E
** Motion to lower court to prepare the record, and to limit the record via a Rule 321 motion, since record is very huge (according to both Dep. Clerk, Patricia O'Brien, who described it as "boxed" and Appellant, Watts, who described the enormously large docket posted by the clerk's office—which motion was court-stamped, docketed, and ignored by the circuit judge & not ruled on—at all.	Exhibit-F
** Last-known email addressed of Erika R. Rhone, one of the parties	Exhibit-G
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** E-mail exchange between Appellant and Atty. Carry Dolan, wherein she offers proof that their client has gotten leave of the court to withdraw, and asking Appellant to remove her from the Service List—which request was granted as it was properly-placed	Exhibit-I

ADDITIONAL INFORMATION

The Police Department may take additional steps in evaluating this case. The steps include interviewing witnesses, examining evidence and consulting with the State Attorney. You may receive information regarding the status of this case by contacting the Lakeland Police Department's Victim Assistance Program at 863-834-6914 or 834-6903 or 834-8946. You may also reach victim services via email at <http://www.lakelandgov.net/lpd/investigative-svcs/victims-assistance>. You should report any additional information about your case to the Station Duty Officer by calling 863-834-6900.

Event Number: 2018-15147

Officer: PSA Kerchner #646

Note: To obtain a copy of the police report, please contact the Lakeland Police Department's Records Section at 863-834-6936, Monday - Friday, 8:00 am to 5:00 pm., or via email at: [lpdrecords@lakelandgov.net](mailto:lpdrecords@lakelandgov.net).

The Lakeland Police Department is an equal opportunity provider and employer.

2018-15147

20

Gordon Wayne Watts  
YOUR RIGHTS

AS A

VICTIM OR WITNESS

4398  
Robert  
Spehr  
Spahr  
8-12-18



VICTIM ASSISTANCE PROGRAM  
LAKELAND POLICE DEPARTMENT

219 N. MASSACHUSETTS AVENUE

LAKELAND, FL 33801

863-834-6914 | 834-6903 | 834-8946

Email: [LPD.VictimAssistance@lakelandgov.net](mailto:LPD.VictimAssistance@lakelandgov.net)

EMERGENCY: DIAL 911 (VOICE & TDD)

LATE PM. 2 Fri. 27 Jul 2018  
Early Am. Saturday 28 July 2018

Invited on July 28 (Sat) Ann  
more Friday (28) 7:00 PM 5:27  
2018

Me  
myself



18-15147

Supplement No  
ORIG

# LAKELAND POLICE DEPARTMENT



219 N. MASSACHUSETTS AVENUE  
LAKELAND, FL 33801

Phone  
(863) 834-6900  
Fax  
(863) 834-6931

Reported Date  
07/29/2018  
Incident Type  
CRIM MISCHIEF (MISD) S  
Member#  
KERCHER, TAMMY M

## Administrative Information

Agency <b>LAKELAND POLICE DEPARTMENT</b>		Report No <b>18-15147</b>	Supplement No <b>ORIG</b>	Reported Date <b>07/29/2018</b>	Reported Time <b>15:31</b>
CAD Call No <b>182100142</b>	Status <b>Report To Follow</b>	Incident Type <b>Criminal Mischief (Misdemeanor)</b>			
Location <b>821 ALICIA RD</b>					City <b>Lakeland</b>
ZIP Code <b>33801</b>	Beat <b>D</b>	District <b>NW</b>	Sector <b>14</b>	From Date <b>07/27/2018</b>	From Time <b>00:05</b>
				To Date <b>07/28/2018</b>	To Time <b>06:50</b>
Member# <b>19411/KERCHER, TAMMY M</b>		Assignment <b>93</b>	Entered By <b>19411</b>	Assignment <b>93</b>	RMS Transfer <b>Successful</b>
Prop Trans Stat <b>Successful</b>	Approving Officer <b>11143</b>	Approval Date <b>07/29/2018</b>	Approval Time <b>17:30:56</b>		
# Offenses <b>1</b>	Offense <b>806.13 (1) (B) 1..</b>	Description <b>Criminal Mischief (\$</b>	Attempted		
Link <b>OTH</b>	Involvement <b>VIC</b>	Invl No <b>1</b>	Name <b>WATTS, GORDON</b>	Race <b>W</b>	Sex <b>M</b>
DOB <b>05/16/1966</b>					

## Person Summary

Invl <b>VIC</b>	Invl No <b>1</b>	Type <b>P</b>	Name <b>WATTS, GORDON</b>	MN <b>10208871</b>
Race <b>W</b>	Sex <b>M</b>	DOB <b>05/16/1966</b>		

## Vehicle Summary

Invl <b>CRM</b>	Type <b>2</b>	License No <b>3400YT</b>	State <b>FL</b>	Lic Year <b>2019</b>	Year <b>1993</b>	Make <b>DODG</b>	Model	Style <b>VN</b>	Color <b>BLU</b>
--------------------	------------------	-----------------------------	--------------------	-------------------------	---------------------	---------------------	-------	--------------------	---------------------

## Property Summary

Involvement <b>DAM</b>
Description <b>Auto: 1993 DODG BLU 3400YT DRILLED A HOLE IN THE GAS TANK ON THE DRIVERS SIDE</b>

## LAKELAND POLICE DEPARTMENT

## Victim (Person) 1: WATTS, GORDON

Involvement <b>Victim (Person)</b>		Invt No <b>1</b>	Type <b>Person</b>						
Name <b>WATTS, GORDON</b>							MN <b>10208871</b>	Race <b>White</b>	Sex <b>Male</b>
DOB <b>05/16/1966</b>	Age <b>52</b>	Juvenile? <b>No</b>	Height <b>5'09"</b>	Weight <b>130#</b>	Hair Color <b>Brown</b>	Eye Color <b>Hazel</b>	PRN <b>1340120</b>	SIGNED <b>Yes</b>	
Type <b>Home</b>	Address <b>821 ALICIA RD</b>								
City <b>Lakeland</b>		State <b>Florida</b>	ZIP Code <b>33801</b>	Date <b>07/29/2018</b>					
Type <b>Driver License</b>		ID No <b>W320299661760</b>	OLS <b>Florida</b>						
Phone Type <b>Home</b>	Phone No <b>(863) 687-6141</b>			Date <b>07/29/2018</b>					

## Vehicle: 3400YT

Involvement <b>Object of a crime burglary/vandalism/etc.</b>				Type <b>Truck/Van</b>	License No <b>3400YT</b>	State <b>Florida</b>		
Lic Year <b>2019</b>	Lic Type <b>Regular Passenger Automobile Plates</b>	Year <b>1993</b>	Make <b>Dodge</b>	Style <b>Van, Van Trailer</b>				
Color <b>Blue</b>	VIN <b>2B4FH2535PR247822</b>							

## Property

Prop # <b>1</b>	Involvement <b>Damaged</b>	Invt Date <b>07/29/2018</b>	In Custody? <b>No</b>	Security <b>No</b>	Stn/Damg Prop Value <b>\$160.50</b>			
Description <b>DRILLED A HOLE IN THE GAS TANK ON THE DRIVERS SIDE</b>							Typ <b>V</b>	
Cat <b>Auto Parts-Auto,ATV,Boat parts tools Acces</b>								
Article <b>Other Auto/Boat/ATV/Aircraft Part Access</b>				Type <b>Truck/Van</b>	License No <b>3400YT</b>	State <b>Florida</b>	Lic Year <b>2019</b>	
Lic Type <b>Regular Passenger Automobile Plates</b>		Year <b>1993</b>	Make <b>Dodge</b>	Style <b>Van, Van Trailer</b>	Color <b>Blue</b>			
VIN <b>2B4FH2535PR247822</b>		Entered Date <b>07/29/2018</b>	Entered Time <b>16:16</b>	RMS Transfer <b>Successful</b>	Control <b>11143</b>	<b>0729181732</b>		

Link <b>OWN</b>	Involvement <b>VIC</b>	Invt No <b>1</b>	Name <b>WATTS, GORDON</b>				Race <b>W</b>	Sex <b>M</b>
DOB <b>05/16/1966</b>								

## Modus Operandi

Method of Entry <b>Unknown</b>	Point of Entry <b>Already on premises</b>	Entry Location <b>Other</b>	Premise Type <b>Vehicle/Residential-house</b>				
Crime Code(s) <b>Criminal Mischief - Felony/Misd</b>							

## Narrative

## INCIDENT SCENE:

This incident took place in the yard of a residence, located at 821 Alicia Road.

## INVESTIGATION:

On 7/29/18 at approximately 1555 hours, I PSA Kercher #646 responded to a residence, located at 821 Alicia Road in reference to a criminal mischief, not in progress. On scene, I met with the victim, Gordon Watts and I interviewed him regarding this incident. Watts reported between 7/27/18 at approximately 0005 and 7/28/18 at approximately 0645 hours someone drilled a hole in the gas tank on his van.

Watts reported that he was awakened on 7/28/18 at approximately 0645 hours by a strong smell of gas. Watts reported the van was parked in the grass on the north side of his residence. Watts reported the ground was wet and smelled of gas. Watts reported that his vehicle was towed to a repairs shop on 7/28/18. Watts reported he was informed by the mechanic that someone had drilled a large hole into the gas tank on the driver's side of the vehicle. Watts reported that it costed \$160.50 to repair the van.

Watts reported that he did not have any suspect information at this time.

Report Officer <b>19411/KERCHEER, TAMMY M</b>	Printed At <b>07/29/2018 17:32</b>	Page 2 of 3
--	---------------------------------------	-------------

# LAKELAND POLICE DEPARTMENT

## Narrative

I observed the van parked on the north side of the victim's residence. I noticed the ground was dark and there was a strong smell of gas. Watts reported that he was so busy on 7/28/18 with trying to get the van fixed that he did not have time to make a report.

### CONCLUSION:

I provided a Victim's Right's pamphlet to Watts along with an event number.

I had no further involvement in this case.

I swear or affirm this report is correct and true to the best of my knowledge and belief.

(This report has been electronically signed.)

KERCHER, TAMMY M - 19411

07/29/2018

Signature of Deputy/Agency Member

Date

Sworn before me this 29th day of July, 2018.

STEVENS, CYDCHARIS - 16249

Notary/Law Enforcement Officer

Commission Number/Expiration

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

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**AXIOM CHECKING-XXXXXXXX3548**

**Account Summary**

Date	Description	Amount	Description	Amount
07/14/2018	Beginning Balance	\$2,297.36	Average Available Balance	\$1,541.16
	3 Credit(s) This Period	\$336.32		
	35 Debit(s) This Period	-\$2,130.43		
08/15/2018	Ending Balance	\$503.25		

*Handwritten notes and arrows pointing to the ending balance.*

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800-584-0015

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**Account Activity**

Post Date	Description	Debits	Credits	Balance
07/14/2018	Beginning Balance			\$2,297.36
07/16/2018	HOSTGATOR.COM POS 8669642867 TX US 269668	\$120.00		-\$2,177.36
07/18/2018	HOSTGATOR.COM POS 8669642867 TX US 753228		\$15.00	-\$2,192.36
07/20/2018	FAMILY DOLLAR #4 POS LAKELAND FL US 964773	\$13.20		-\$2,179.16
07/21/2018	USPS KIOSK 11492 POS LAKELAND FL US 614715	\$2.89		-\$2,176.27
07/21/2018	USPS KIOSK 11492 POS LAKELAND FL US 918076	\$48.72		-\$2,127.55
07/28/2018	MURPHY6547ATWALM POS LAKELAND FL US 446438	\$20.00		-\$2,107.55
07/28/2018	Wal-Mart Super C POS LAKELAND FL US 352651	\$327.09		-\$1,780.46
07/30/2018	CHAMBERLINS NATU POS LAKELAND FL US 671599	\$30.39		-\$1,750.07
07/30/2018	Wal-Mart Super C POS PLANT CITY FL US 151645	\$41.35		-\$1,708.72
07/30/2018	SQ * SQ * DAVID WI POS	\$161.00		-\$1,547.72

*Handwritten notes and corrections:*  
 \$15.00 / year X 8 years Gordon Wayne Watts, owner.  
 Domain NAME Registration  
 Printer Paper + Snack  
 Count - Duplexed Low Service Cop  
 Monthly Card Case  
 Other Service Refill  
 GAS  
 Milk Thistle w/ Senior Discount  
 Solar Motion Light  
 Garage

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

10821 2017155 032904 045607 0002/0004

# AXIOM CHECKING-XXXXXXXX3548 (continued)

## Account Activity (continued)

Post Date	Description	Debits	Credits	Balance
	Lakeland FL US 377485 *****8222 72648064			
07/30/2018	LOWES #01592* POS Motion Lighty Extension Cords PLANT CITY FL US 795742 Electrical Taps	\$115.77		-\$1,431.95
07/30/2018	Wal-Mart Super C POS N-Cod Drill & Cordx AUBURNDALE FL US 722538 Wal Staps	\$26.37		-\$1,405.58
07/31/2018	TARGET T- 4005 H POS Lakeland FL US 319248 *****8222 07180043	\$6.98		-\$1,398.60
07/31/2018	WAWA 5106 POS LAKELAND FL US 285669 *****8222 14945701	\$20.00		-\$1,378.60
08/01/2018	DEPOSIT LAKELAND Church benevolence - Rest/Electronic		(\$300.00)	-\$1,678.60
08/01/2018	COMPUTER EDGE I POS CLEAN Keyboard	\$35.00		-\$1,643.60
08/01/2018	Wal-Mart Super C POS Gorilla Taps, Adapters, Tools, etc LAKELAND FL US 352779 (over the counter) med for men	\$63.60		-\$1,580.00
08/01/2018	Wal-Mart Super C POS Security Camera, DVR, & 3yr Suppl LAKELAND FL US 011088 *****8222 07790067	\$313.51		-\$1,266.49
08/02/2018	Wal-Mart Super C POS Audio Cables LAKELAND FL US 211580 *****8222 07790009	\$7.45		-\$1,259.04
08/03/2018	MID FLORIDA AUDI POS BNC Cables, Connectors, T-Adapters/Adapters LAKELAND FL US 220128 *****8222 07105692	\$51.94		-\$1,207.10
08/03/2018	PP* WB4ONX POS Jim Sapp - Amplified Microphone & Cable for CAMERA LAKELAND FL US 773006 *****8222 26973909	\$136.95		-\$1,070.15
08/06/2018	WAL-MART #1245 POS Splitters & Adapters LAKELAND FL US 690487 *****8222 24124501	\$62.34		-\$1,007.81
08/06/2018	WAL-MART #0779 POS Camera System Speakers LAKELAND FL US 606355 *****8222 24077901	\$21.32		-\$986.49
08/06/2018	WAL-MART #0779 POS USB charging Station LAKELAND FL US 204456 *****8222 24077901	\$18.15		-\$968.34
08/06/2018	THE HOME DEPOT # POS 12'x16' Blue Tarp LAKELAND FL US 072513 *****8222 06098901	\$26.73		-\$941.61
08/07/2018	LN* COOKCOCIVIL POS 43.50 + 0.96 Specfic 866-255-1857 IL US 282588 *****8222 55458566	\$46.46		-\$895.15
08/07/2018	LN* COOKCOCIVIL POS 31.00 + 0.65 866-255-1857 IL US 485375 *****8222 55458491	\$31.65		-\$863.50
08/10/2018	WM SUPERCENTER # POS House Light Adapter A LAKELAND FL US 159197 \$60.00 cash back in case card is bad *****8222 07790007	\$73.26		-\$790.24
08/11/2018	WAL-MART #5035 POS Red Bull MULBERRY FL US 905981 *****8222 24503501	\$2.68		-\$787.56
08/11/2018	WM SUPERCENTER # POS LED House Light, Socket Adapters, & Gorilla Tape MULBERRY FL US 438945 *****8222 50350039	\$94.95		-\$692.61
08/13/2018	Wal-Mart Super C POS LAKELAND FL US 450610 *****8222 07790093	\$21.32		-\$713.93
08/13/2018	Wal-Mart Super C POS LAKELAND FL US 340030 Computer Speakers & Adapters (Camera Security System) *****8222 07790044	\$43.98		-\$669.95

(\$300.00)  
Check # 61505  
Invoice # 4  
Date 7/20/18

Get receipts

Security System

Jim  
Cash  
Cash  
(Cash)

Apple Ro  
\$1.00 CASH

\$21.32  
Returned

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005002 1125197 0000000 027812 005628 02/20

**AXIOM CHECKING-XXXXXXXX3548 (continued)**

Account Activity (continued)

Post Date	Description	Debits	Credits	Balance
08/13/2018	WAL-MART #0779 POS <i>Spray Paint (LL House)</i> LAKELAND FL US 764918	\$24.79		-\$645.16
08/13/2018	*****8222 24077901 WM SUPERCENTER # POS <i>Baseball Cap LED lights</i> LAKELAND FL US 157316 <i>House ADDRESS Numbers</i> *****8222 07790046 <i>&amp; Night Lights (to indicate Power on Motion Light)</i>	\$28.72	<i>BIG UMBRELLA</i>	-\$618.44
08/13/2018	WAL-MART #0779 POS LAKELAND FL US 229456 <i>Extension Cords</i> *****8222 24077901	\$28.51		-\$589.93
08/13/2018	MCDONALD'S F2889 POS <i>Food</i> MULBERRY FL US 232626 *****8222 35998205	\$6.19		-\$583.74
08/15/2018	WM SUPERCENTER # POS LAKELAND FL US 146603 *****8222 07790037	\$28.76		-\$554.98
08/15/2018	WM SUPERCENTER # POS <i>Morr House Address Numbers</i> MULBERRY FL US 127151 <i>Extension Cords, Home Lamps (LED bulbs)</i> *****8222 50350039	\$51.73		-\$503.25
08/15/2018	Ending Balance			-\$503.25

Daily Balances

Date	Amount	Date	Amount	Date	Amount
07/16/2018	\$2,177.36	07/31/2018	\$1,378.60	08/10/2018	\$790.24
07/18/2018	\$2,192.36	08/01/2018	\$1,266.49	08/11/2018	\$692.61
07/20/2018	\$2,179.16	08/02/2018	\$1,259.04	08/13/2018	\$583.74
07/21/2018	\$2,127.55	08/03/2018	\$1,070.15	08/15/2018	\$503.25
07/28/2018	\$1,780.46	08/06/2018	\$941.61		
07/30/2018	\$1,405.58	08/07/2018	\$863.50		

*Pay Pal  
+ 30.47  
Pay Pal  
Aug 19, 2018*

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### SWITCH TO ONLINE STATEMENTS

Beginning **October 1, 2018**, customers\* who are not enrolled in eStatements, will incur a **\$5 monthly paper statement charge**.

Enroll in **eStatement** and have **24/7 access** to all of your bank statements from any device.

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- ✔ Click on **Accounts**, then **Documents**
- ✔ Enroll in eStatement for each account

\*Does not apply to Senior Checking accounts.

CALL 800-584-0015

ASK a Relationship Banker

### AXIOM CHECKING-XXXXXXXX3548

Aug 16 2018 Reb Mem via Paypal 21.06 Net  
22.66 (Total)

#### Account Summary

Date	Description	Amount	Description	Amount
08/16/2018	Beginning Balance	\$503.25	Average Available Balance	\$595.07
	3 Credit(s) This Period	\$781.82		
	15 Debit(s) This Period	-\$527.09		
09/14/2018	Ending Balance	\$757.98		

*Handwritten notes:*  
 ((~~12~~ \* 0.97) - 0.30) = NET  
 (House Dep) via Paypal  
 Aug 07 2018 (Reg Home Manager/Adptn) 9.44 Net  
 10.00 Gross

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#### Account Activity

Post Date	Description	Debits	Credits	Balance
08/16/2018	Beginning Balance			\$503.25
08/17/2018	THE HOME DEPOT # POS LAKELAND FL US 481010 *****8222 06098901	\$28.83		\$474.42
08/18/2018	STAPLES 00 POS LAKELAND FL US 255871 *****8222 08721352	\$246.08		\$228.34
08/20/2018	PAYPAL TRANSFER 180819 PRD		\$30.47	\$258.81
08/20/2018	MURPHY6547ATWALM POS LAKELAND FL US 816574 *****8222 92687601	\$30.00		\$228.81
08/24/2018	Wal-Mart Super C POS LAKELAND FL US 110111 *****8222 12450028	\$27.86		\$200.95
08/27/2018	PAYPAL TRANSFER 180824 PPD		\$11.35	\$212.30
08/30/2018	DEPOSIT LAKELAND		\$740.00	\$952.30
09/04/2018	METROPCS TEL POS BELLEVUE WA US 670680 *****8222 001	\$5.00		\$947.30
09/05/2018	SPEEDWAY 06429 POS LAKELAND FL US 957115 *****8222 73EQXQI2	\$5.00		\$942.30
09/06/2018	STEAK-N-SHAKE#00 POS LAKELAND FL US 952925 *****8222 57856019	\$6.42		\$935.88
09/06/2018	SUPER SEVEN BR POS PLANT CITY FL US 192925 *****8222 27236301	\$5.00		\$930.88
09/06/2018	LOWE'S #1592 POS	\$54.78		\$876.10

*Handwritten notes:*  
 (Treatatively - correct)  
 Get Receipt  
 Sold Daily Every Sat 4:00 PM



**AXIOM CHECKING-XXXXXXXX3548 (continued)**

**Account Activity (continued)**

Post Date	Description	Debits	Credits	Balance
	PLANT CITY FL US 756947 *****8222 001			
09/06/2018	WM SUPERCENTER # POS LED Light Bulbs + Ext. Cords ✓	\$48.72		\$827.38
	PLANT CITY FL US 360558 *****8222 05470031			
09/08/2018	RACETRAC 2313 POS Debit GA (w/ Debit on Receipt) ✓	\$5.00		\$822.38
	PLANT CITY FL US 636624 *****8222 15714901			
09/08/2018	WAL-MART #0547 POS Lights / Adaptors, etc. ✓	\$43.40		\$778.98
	PLANT CITY FL US 762886 *****8222 24054701			
09/10/2018	SUNOCO 058239680 POS Debit Gas + Snack ✓	\$7.45		\$771.53
	PLANT CITY FL US 271369 *****8222 27629803			
09/10/2018	CVS/PHARM 00163- POS Debit Duct Tape ✓	\$8.55		\$762.98
	Lakeland FL US 315959 *****8222 30016302			
09/14/2018	BP#2762003GIANT POS Debit Probably Milk + Transit ✓	\$5.00		\$757.98
	LAKELAND FL US 695180 *****8222 38555701			
09/14/2018	Ending Balance			\$757.98

**Daily Balances**

Date	Amount	Date	Amount	Date	Amount
08/17/2018	\$474.42	08/27/2018	\$212.30	09/06/2018	\$827.38
08/18/2018	\$228.34	08/30/2018	\$952.30	09/08/2018	\$778.98
08/20/2018	\$228.81	09/04/2018	\$947.30	09/10/2018	\$762.98
08/24/2018	\$200.95	09/05/2018	\$942.30	09/14/2018	\$757.98

Testative

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

004033 1130140 0000000 01655 023310 02/03

DATE	DESCRIPTION	Amount	BAZ
<del>9/14/2018</del>	<del>757.98</del>		
9/15/2018	Carryover	+757.98	757.98
9/16	Rightful GAS	-6.00	751.98
9/18	Erbonds (Fuel)	-4.99	746.99
9/18	GAS (Speedway 3117 S. Fla)	-6.00	740.99
9/18	Sherr (WalMart)	-16.00	724.99
9/18	Duct Tape (Family Dollar)	-7.49	717.50
9/19	Spectrum (Phone Bill 9880)	-59.98	657.52
9/19	KeyCntr (Plant City Lock & Key)	-30.97	626.55
9/19	Gas (Morristown Redman Truck)	-7.00	619.55
9/19	ShinJin (Amenity Auto)	-9.62	609.93
9/20	Goodwill (Duct Tape Gutter Sealant Etc)	-2.01	607.92
9/20	Gas/Oil (Citgo)	-9.27	598.65
9/22	LEDs + Keyboard (WalMart)	Gift Card ☺ %A	
9/22/18	GAS Citgo 5885 S. Fla	-7.00	591.65
9/24	DuctTape (Home Depot)	-19.22	572.43
9/24	GAS Sunoco E. B. Ave 1165	-2.00	565.43
9/19/2018	Charger (New York Post + Park)	-2.88	562.55 ✓

PARENT STATEMENT Ending  
 ≈ 10/13-17/2018  
 10/13-17/2018

MATH  
 562.55  
 -565.43  
 ---  
 = -2.88

src 1914



Computer (Phone) Says ~~50~~ AVAILABLE  
 BALANCE is 562.55 when I  
 Phoned in @ 620pm on 9/25/2018. checks ✓



*W. Wm. Ellsworth, Jr.*  
*Counsellor at Law*

*P O Box 7667*  
*Lakeland, Florida 33807-7667*  
*(863) 644-9197*  
*Fax: (863) 644-2785*

August 20, 2018

Anne M. Watts  
Gordon Watts  
P.O. Box 4225  
Plant City, FL 33563

Re: Notice of Lease Termination and Notice to Vacate  
That home and premises located at 821 Alicia Dr., Lakeland, FL 33801

Dear Mrs. Watts & Gordon,

As you are aware, the home that you are occupying needs extensive repairs due to Hurricane Irma damage and otherwise, and in this regard the City of Lakeland on 8/2/18 has cited Wingo Investment Corporation, the owner of the above property, with 3 citations requiring repair and upkeep which Gordon has copies of. Wingo does not intend to make these repairs but intends to demolish the premises.

Accordingly, please consider this a formal Notice of Lease Termination & Vacation on behalf of Wingo Investment Corporation, the owner of the above home and premises, which you are occupying on a month-to-month basis. To accommodate you in this regard, it is requested that you vacate on or before Saturday, December 1, 2018 by not only removing yourself from the premises but anything owned by you as the owner, Wingo Investment Corporation, intends to demolish the home you are occupying in December 2018 to remove it from the tax rolls as it has determined that it is not economically feasible to make the ongoing repairs as requested and otherwise.

In the meantime, no rent will be charged you from September 1<sup>st</sup> until you vacate, and it would be appreciated if that might be early prior to December 1<sup>st</sup> with Notice of Vacation be given to Doris W. Ellsworth, President of Wingo Investment Corporation.

Sincerely,

W. Wm. Ellsworth, Jr.

Copy: 821 Alicia Drive  
Lakeland, FL 33801

Dennis Browning  
City of Lakeland  
Code Enforcement Officer  
dennis.browning@lakelandgov.net



Gordon Watts &lt;gww1210@gmail.com&gt;

## 8/20/18 Notice of Lease Termination and Notice to Vacate that home and premises located at 821 Alicia Dr., Lakeland, FL 33801

Gordon Watts &lt;gww1210@gmail.com&gt;

Fri, Aug 24, 2018 at 10:12 AM

To: deewingo@aol.com

Cc: "Gww1210@aol.com" &lt;gww1210@aol.com&gt;, Gordon Watts &lt;gww1210@gmail.com&gt;,

"Gww12102002@yahoo.com" &lt;gww12102002@yahoo.com&gt;, Gordon Watts &lt;gordonwaynewatts@aol.com&gt;, Gordon Watts &lt;gordonwaynewatts@hotmail.com&gt;

Thank you for the clarification on both points. Mom wanted to keep the water heater, even Tho I don't know if we will need one-- or if it is easily movable. Thing like my wall -unit air conditioner, however, are probably useful. Also, you make a good argument about how you have been generous tip us, both in the past and this time with regard to the free rent in our closing months, and I'll be sure to call mom right now and update her on both points.

Gordon

On Thu, Aug 23, 2018, 3:38 PM <deewingo@aol.com> wrote:

Dear Gordon,

Responding to your email of 8/21/18 received on 8/22/18:

1. I forgot to tell you that upon timely vacating the premises you and/or your mom may take from the above premises at no cost to you anything contained within or may be attached to it if it will help you with your move to your Plant City house. This would include but not be limited to appliances, light fixtures, air conditioning unit, and any materials that may be salvageable and could be used by you.
2. The 12/1/18 date required for the premises to be vacated is 3 months and 10 days from the Notice to you which is more than sufficient for that purpose. Additionally, any moving expenses can be offset by the 3 months rent you will not be paying. Consequently, your date of vacation of 12/1/18 is non-negotiable, and I intend shortly to be contracting for the premises demolition on that date as the premises must be demolished before 12/31/18 in order to be excluded from the County and City tax roll for 2019 taxes.

Thank you,

Doris W. Ellsworth

-----Original Message-----

From: Gordon Watts <gww1210@gmail.com>

To: deewingo <deewingo@aol.com>

Cc: Gww1210@aol.com <gww1210@aol.com>; Gordon Watts <gww1210@gmail.com>;

Gww12102002@yahoo.com <gww12102002@yahoo.com>; Gordon Watts <gordonwaynewatts@aol.com>;

Gordon Watts <gordonwaynewatts@hotmail.com>

Sent: Wed, Aug 22, 2018 3:48 am

Subject: Fwd: Notice of Lease Termination and Notice to Vacate That home and premises located at 821 Alicia Dr., Lakeland, FL 33801

Thank you for your timely notice, Doris, but for important matters, please remember I have several email addresses, and i regularly check both "gww1210" addresses. I am sorry to get evicted, but probably, you are right that mom and I should live in a home we own, versus renting. \*\*\* GOOD NEWS: When mom was mentioning hiring a general contractor, yesterday (Tue 21 Aug 2018), I asked her why she would need one if she plans to sell her house, and she said that she changed her mind & wants to keep it. See, I told you that

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

miracles were possible!.. When I asked her when & why she changed her mind, she said that she changed her mind this past Friday (Aug 17, 2018), and it was because you evicted us (giving her a wakeup call to reality, and proving us both right that her house is in better condition). She \*did\* say that three (3) months may not be enough, and that she would pay for the 4th and extra month. While I think that it \*will\* be enough, her concern is not without reason: When dad's landlord (Sun T. Choe) asked me to remove our stuff & vacate the shop, I unexpectedly landed in the emergency room after nearly bleeding to death from a reaction to over-the-counter meds, thus delaying me. While this is unlikely to happen again, this is a reminder that unexpected delays can come up. I hope & think that giving us til Dec 01 will be enough, so I will not cross any other bridge til I come to it. My biggest regret is that you didn't drop the hammer sooner, but better late than never. I think things will work out; thank you for your efforts. I did call Mike Kennedy, and he thinks he will have time to sit down with me, you, and mom, and brainstorm options & solutions. Meantime, I continue to work 'round the clock to safely vacate myself & belongings without incurring a false arrest at the hands of my mother for moving her belongings without her authorization. All This will be a challenge, and time will tell, but thanks for your efforts & assistance thus far.

Gordon Wayne Watts

----- Forwarded message -----

From: <deewingo@aol.com>

Date: Aug 20, 2018 11:04 AM

Subject: Notice of Lease Termination and Notice to Vacate That home and premises located at 821 Alicia Dr., Lakeland, FL 33801

To: <gww1210@gmail.com>

Cc:

Dear Gordon,

Please see attached.

Thank you,

Doris W. Ellsworth

----- Forwarded message -----

From: <deewingo@aol.com>

Date: Aug 20, 2018 11:04 AM

Subject: Notice of Lease Termination and Notice to Vacate That home and premises located at 821 Alicia Dr., Lakeland, FL 33801

To: <gww1210@gmail.com>

Cc:

Dear Gordon,

Please see attached.

Thank you,

Doris W. Ellsworth



Gordon Watts &lt;gww1210@gmail.com&gt;

---

**Record on Appeal in 1-18-0091: Quote requested**

---

**Patricia A. O'Brien (Circuit Court)** <paobrien@cookcountycourt.com>

Mon, Oct 15, 2018 at 10:17 AM

To: Gordon Watts &lt;gww1210@gmail.com&gt;

Cc: "Timothy Evans (Judiciary)" &lt;timothy.evans@cookcountyl.gov&gt;, "James Flannery (Judiciary)" &lt;james.flannery@cookcountyl.gov&gt;, "Diane Shelley (Judiciary)" &lt;diane.shelley@cookcountyl.gov&gt;, "Gww1210@aol.com" &lt;Gww1210@aol.com&gt;, "Gww1210@gmail.com" &lt;gww1210@gmail.com&gt;

Good Morning Gordon,

As you know from our numerous prior discussions, the Civil Appeals Division does not prepare Records on Appeal unless the Request for Preparation of Record on Appeal form has been efiled and the statutory fee paid.

Pursuant to Illinois Supreme Court Rule 321, you may only limit the Record on Appeal by stipulation of the parties or by order of court. Also, as you know, my division is required to prepare Records in accordance with the Supreme Court Rules and Standards for Preparation of Electronic Records- you are not able to direct us otherwise.

We do not provide estimates in advance of the Record being prepared because we have no means to calculate it until the images have been reviewed and prepared. However, as you are well aware, this case is eleven years old and was several boxes in size many years ago.

The Record on Appeal in this case will not be prepared by this Wednesday because you never filed your Request form.

Sent from [Mail](#) for Windows 10

---

**From:** Gordon Watts <gww1210@gmail.com>**Sent:** Monday, October 15, 2018 4:45:01 AM**To:** Patricia A. O'Brien (Circuit Court); civilappeals (Circuit Court)**Cc:** Timothy Evans (Judiciary); James Flannery (Judiciary); Diane Shelley (Judiciary);[Gww1210@aol.com](mailto:Gww1210@aol.com); [Gww1210@gmail.com](mailto:Gww1210@gmail.com)**Subject:** Record on Appeal in 1-18-0091: Quote requested

CIVIL APPEALS DIVISION: Richard J. Daley Center, [50 West Washington St.](#), Room 801  
Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri,



Excl. Holidays

Attention: Deputy Chief, Patricia O'Brien, PAOBrien@CookCountyCourt.com

Cc: Chief Judge and assigned judges on Circuit Court level

Attorney O'Brien:

As you are aware, the Appeals Court has granted numerous extensions of time in my appeal of 2007-CH-29783, where I have asserted Rights of Intervention. While I'm very displeased (and rightly confused) that the court has claimed it somehow or another lacks appellate jurisdiction to limit the record on appeal or address intervention -- in spite of clear case law to the contrary (see e.g., 05/03/2018 order of 1st Appellate Court where it disclaims jurisdiction "to order the Cir. Ct. to allow Watts leave to intervene, grant a fee waiver, or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572)," an appeal of Judge Flannery's order regarding the sister case, 1-18-0091 -- Contra: City of Chicago v. John Hancock Mutual Life Ins. Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984) -- which the 1st App.Ct. wrote on Intervention or, perhaps, Rule 321, which allows the Appellate Court to limit Contents of the Record on Appeal to only a few Sine Qua Non required filings, sufficient for This Court to easily & quickly review & decide the case)...

...nonetheless, The First Appellate Court has mercifully & graciously extended time twice (the 3/28/18 order extending time to June 12, 2018, and the 07/25/18 order extending time to October 17, 2018 to file the record on appeal).

I am aware of the limits of your authority, and you can rest assured that I'm not asking you to prepare a Rule 321 "limited" record (which can only be allowed by the circuit or appellate courts), but as both courts, in their infinite wisdom, have decided to deny my request for a limited record (which I might be able to pay for), this limits me to an "all or nothing" approach at my appeal... and let me remind you, Patricia, that a lot is riding on my appeal. Since Daniggelis' attorney has been want in prosecution of his appeal, it is dead, and mine is the only live case, and, if I lose, not only my "interests" in intervention are denied their day in court, but my elderly friend remains homeless, which, at his age, no doubt, jeopardizes his health and life.

Therefore, I wish to get my fair day in court. To that end, while I know you can't do much else, I will ask you to do what you can do, and that is this: Please give me a quote, that is, an estimate, on the preparation of the record on appeal, which, by the way, is due this Wednesday, 17 October 2018, unless the court grants me another extension of time.

We just got evicted, and right before that, some nutcase drilled a half-inch drill into my gas tank, and I had to drop several thousand dollars into security cameras, motion lights, etc., and, being unemployed (we're being evicted, leaving me no time to work), those

hardships took the monies I might have spent on a "full" record on appeal. Thus, I repeat my request: I request an estimate of the full record on appeal (or some method wherein I might purchase a partial record, which I might be able to afford).

Alternatively, I propose that the record be posted electronically, without alteration (which would alleviate your clerks of the many hours of preparation), in other words, when I file a motion before, for example one of the judges in this Law Division case, the judges can read the full record electronically **\*\*without\*\*** your civil appeals division having to prepare **\*\*anything\*\***. If you did this for me, this would ((#1)) save me loads of monies ((#2)) possibly save elderly Daniggelis' life, as he was made homeless ((#3)) save your clerks hours of needless preparation and ((#4)) set precedent to save Cook County Circuit Court untold millions of dollars, since allowing citizens the same portal interface as judges would work: It worked for judges, and would work for litigants.

Anyhow, the appeals court is probably wondering if I am slack in my desire to prosecute this case, but my email to you, and any response you might give, are slated to be put in my appendix in my upcoming Motion to Extend Time, so that I may show that I am not want for prosecution, as Mr. Daniggelis' attorney was. Thank you, in advance, for giving me a reasonable, moral, and fair quote to prepare the record in a timely manner, in this case which has dragged on for too many decades, in the which no one has shown cause why Daniggelis' house could be snatched from him, on admitted fraud (see my pleading where I quote Judge Otto) without him having been paid a dime.

P.S.: No matter how frustrated I am with the 3 levels of court (which includes your Supreme Court's treatment of my recent motion in file #:123481), I must show proper **\*\*and complete\*\*** respect for the courts, particularly the appellate court, which has twice extended time to file the record, and to that end, I am making a special effort to grant the appeals court's request to get the record, and transmit it to them--in order to meet the court half-way, and do my part to make their jobs (they are people too, you know), as easy as is reasonably possible. And, if there is anything I can do to make **\*your\*** job easier, I will, but I am maxed out on several levels, but to recap: Record on Appeal in 1-18-0091: Quote requested, and electronic miracles welcome, as described above.

--

\*Gordon Wayne Watts, editor-in-chief, The Register\*

\* [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) \* <<http://www.gordonwaynewatts.com/>>\* / \*\*  
[www.GordonWatts.com](http://www.GordonWatts.com) \* <<http://www.gordonwatts.com/>>

\*A\*\*LWAYS FAITHFUL - To God\*

\*BS, The Florida State University, Biological & Chemical Sciences  
 AS, United Electronics Institute\*

\*821 Alicia Road, Lakeland, FL 33801-2113

Home: (863) 688-9880 \*\*Work: (863) 686-3411 Voice&FAX: (863)

687-6141\*\*Cell: (863)409-2109

See also: **\*\*[http://Gordon\\_Watts.Tripod.com/consumer.html](http://Gordon_Watts.Tripod.com/consumer.html)**\* <[http://gordon\\_watts.tripod.com/](http://gordon_watts.tripod.com/)>

[consumer.html](#)>

\*[Gww1210@aol.com](mailto:Gww1210@aol.com) ; [Gww12102002@Yahoo.com](mailto:Gww12102002@Yahoo.com) \*

\*Truth is the strongest, most stable force in the Universe\*

\*Truth doesn't change because you disbelieve it\*\*

TRUTH doesn't bend to the will of tyrants

\*\*[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)\* <<http://www.gordonwaynewatts.com/>>\* / \*\*

[www.GordonWatts.com](http://www.GordonWatts.com)\* <<http://www.gordonwatts.com/>>\*

Get Truth.\*

\*"First, they [Nazis] came for the Jews. I was silent. I was not a Jew.

Then they came for the Communists. I was silent. I was not a Communist.

Then they came for the trade unionists. I was silent. I was not a trade

unionist. Then they came for me. There was no one left to speak for me."

(Martin Niemöller, given credit for a quotation in The Harper Religious and Inspirational Quotation Companion, ed. Margaret Pepper (New York: Harper & Row, 1989), 429 -as cited on page 44, note 17, of Religious Cleansing in the American Republic, by Keith A. Fornier, Copyright 1993, by Liberty, Life, and Family Publications.\*

\*Some versions have Mr. Niemöller saying: "Then they came for the Catholics, and I didn't speak up, because I was a Protestant"; other versions have him saying that they came for Socialists, Industrialists, schools, the press, and/or the Church; however, it's certain he DID say SOMETHING like this. Actually, they may not have come for the Jews first, as it's more likely they came for the prisoners, mentally handicapped, & other so-called "inferiors" first -as historians tell us -so they could get "practiced up"; however, they did come for them -due to the silence of their neighbors -and due in part to their own silence. So: "\*Speak up now or forever hold your peace!"-GWW



Gordon Watts &lt;gww1210@gmail.com&gt;

## @Christine Marinakis re your concerns-->previously->>Re: Record on Appeal in 1-18-0091: Quote requested

Gordon Watts <gww1210@gmail.com>

Tue, Oct 16, 2018 at 6:17 PM

To: "CCC.Lawcalendarw" <ccc.lawcalendarw@cookcountyil.gov>, "Gww1210@aol.com" <Gww1210@aol.com>,  
Gordon Watts <gww1210@gmail.com>

Gordon Watts <gww1210@gmail.com>

Cc: "Diane Shelley (Judiciary)" <diane.shelley@cookcountyil.gov>, "Timothy Evans (Judiciary)"

<timothy.evans@cookcountyil.gov>, "Patricia A. O'Brien (Circuit Court)" <paobrien@cookcountycourt.com>, "James Flannery (Judiciary)" <james.flannery@cookcountyil.gov>

Bcc: gww12102002@yahoo.com, gordonwaynewatts@hotmail.com, gordonwaynewatts@aol.com

Chris, this is Gordon again.

My apologies for the brevity of my curt reply below, but I am being evicted, and I just lost my elderly father, and now my friend, Rich Daniggelis, the elderly victim in this case where I named your Judge as a defendant, is homeless because of a broken judicial system, and lost his house (and hundreds of thousands in documented equity) on admitted mortgage fraud, without being paid a dime.

I have been under a lot of stress/pressure- again - apologies. Now, all that I said below was true, but I left out key points to reply to your valid, and genuine, concerns regarding prohibited "ex parte" communications with, say, a judge overseeing a case, and I amend now:

As you know, 5 ILCS 430/5-50 defines ex parte communications as: "any written or oral communication by any person that imparts or requests material information or makes a material argument regarding potential action concerning regulatory, quasi-adjudicatory, investment, or licensing matters pending before or under consideration by the agency." HOWEVER, it goes on to say that: ""Ex parte communication" does not include the following:... (ii) statements regarding matters of procedure and practice, such as format, the number of copies required, the manner of filing, and the status of a matter;," which is the case, here. I am trying to follow the proper procedure on filing my Record on Appeal, because I know that the appeals court Justices have a hard job, and can not read minds, and (as yet) do not have access to the electronic record in the case, in the same manner as Circuit Judges in the Law division (but I am seeing if I can change that procedure, as I speak).

To clarify, no, I am not making any arguments to Judge Shelley via email about my case (tho a few hints were included in my comments in my request for the record). To begin with, you, not she, screens the email, as you are her clerk --and, as such, you are charged with preventing the judge from prohibited ex parte communications on the merits. Moreover, were I I to desire to make an argument before this judge, I would file a motion or other pleading -- such as I did in my 04/20/2018, which is on docket at 2007-CH-29738, GMAC v. Daniggelis, Watts, et. al., where even the docket attests I am a named defendant, and thus a party of record eligible for In Forma Pauperis grant, which

allows me my Record on Appeal gratis and for free. Lastly, as 5 ILCS 430/5-50 clearly says, some ex parte communications are allowed, such as setting hearing dates, procedural matter, like my record, and other exceptions, incl. but not limited to, say, orders of protection, which, of course, preclude the other side from hearing.

I know you meant well, and I don't fault your motives or intents, but, no, I am not making ex parte merit arguments to the judge, here, in my email: Again, had I wanted to do that, I would have filed a motion, such as my 04/20/2018 filing, which is \*\*ON DOCKET at the above-referenced case, and linked here

[https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?NCase=2007-CH-29738&SearchType=0&Database=2&case\\_no=&PLtype=1&sname=&CDate=](https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?NCase=2007-CH-29738&SearchType=0&Database=2&case_no=&PLtype=1&sname=&CDate=)

on which the judge did NOT rule on... even tho, within the body of my SHORT AND SUCCINCT 'notice' filing, I clearly move for a Rule 321 limitation of the record. Your judge CAN NOT claim the she didn't receive my motion, as it is clearly court-stamped. Here is another copy, or two, in case you've lost your copy:

\*\* [https://www.GordonWatts.com/MortgageFraudCourtDocs/Fri20Apr2018\\_MotionClarification\\_07CH29738\\_LawDiv\\_Watts.pdf](https://www.GordonWatts.com/MortgageFraudCourtDocs/Fri20Apr2018_MotionClarification_07CH29738_LawDiv_Watts.pdf)

or

\*\* [https://www.gordonWAYNEwatts.com/MortgageFraudCourtDocs/Fri20Apr2018\\_MotionClarification\\_07CH29738\\_LawDiv\\_Watts.pdf](https://www.gordonWAYNEwatts.com/MortgageFraudCourtDocs/Fri20Apr2018_MotionClarification_07CH29738_LawDiv_Watts.pdf)

Lastly, when service a copy upon the court and clerk, it is customary to include the judge's chambers a copy of all my filings, motions, etc. Even Judge Otto, who issued the blatantly Unconstitutional ruling, giving elderly Daniggelis' to the local rich attorney, Joseph Younes, without any legal basis, never objected to my having served him copies of my filings, and, up to this point, neither have you.

In conclusion: Your concerns are noted, and again, I do not impute malicious motives on your part, but, as a matter of law, your concern is misplaced. Lastly, no matter how frustrated I am with Judge Shelley's blatant disregard for the title theft in this case, I am not trying to insult her (or the judiciary) in any way, and, for the record (this email thread is slated to be in my appendix to demonstrate to the appalls court prosecution on my part regarding procurement of the record on appeal), anyhow, for the record, I will attest and affirm that I vividly recall Daniggelis telling me in numerous phone conversations that Judge Shelley told Andjelko Galic, his attorney, that she would grant his nonsuit (voluntary dismissal) motion, docketed on Dec.07, 2017, that day, but that she couldn't guarantee that she'd be around to hear the case when/if he refiled it in the Law Division, which implies that she wanted to do her best to assure Galic that he would get a fair day in court, but warn him of her limitations regarding transferal out of the division, or random reassignment of the new case to another judge. I'm grateful & thankful that Judge Shelley made such reassuring & respectful comments to Atty. Galic, letting him know that she was doing her best. My recollections on her comments to Galic do not impact the merits of the case, and are, therefore, not prohibited ex parte communications, and, moreover, I'm angry at the court, in general, and Judge Shelley, in particular, for her comments to Daniggelis, telling her to ask me to butt out of

the case, my Intervention rights, notwithstanding, so I have no motives to enter into the record a positive comment about the judge, but my religious beliefs -- whatever they be -- compel me to be honest, respectful, and back up my intents with actions to help the other parties, and judges, to be able to do their jobs as easily as possible, even if I, myself, feel I am being treated unfairly.

With kind regards, I am, Sincerely,

Gordon Wayne Watts

On 10/16/18, gww1210 <[gww1210@gmail.com](mailto:gww1210@gmail.com)> wrote:

> The judge •is• a party of record as she is a named defendant, Chris, in the  
> Mandamus proceedings. Why else would she have an email address if not for  
> moral due process?.. She should have thought of that before doing something  
> to \*become\* a named defendant, incl., but limited to, not even ruling at  
> \*all\* on my timely motions, much less ruling in my favour, fair & practical  
> Due Process, hello? Please, overlook typos earlier, as I am using my  
> smartphone. Gordon Wayne Watts  
> Sent from my MetroPCS 4G LTE Android Device  
> ----- Original message -----From: "CCC.Lawcalendarw"  
> <[ccc.lawcalendarw@cookcountyil.gov](mailto:ccc.lawcalendarw@cookcountyil.gov)> Date: 10/16/18 1:58 PM (GMT-05:00) To:  
> "From: gww1210" <[gww1210@gmail.com](mailto:gww1210@gmail.com)>, [Gww1210@aol.com](mailto:Gww1210@aol.com), "From: gww1210"  
> <[gww1210@gmail.com](mailto:gww1210@gmail.com)> Cc: "Diane Shelley (Judiciary)"  
> <[diane.shelley@cookcountyil.gov](mailto:diane.shelley@cookcountyil.gov)>, "Timothy Evans (Judiciary)"  
> <[timothy.evans@cookcountyil.gov](mailto:timothy.evans@cookcountyil.gov)>, "Patricia A. O'Brien (Circuit Court)"  
> <[paobrien@cookcountycourt.com](mailto:paobrien@cookcountycourt.com)>, "James Flannery (Judiciary)"  
> <[james.flannery@cookcountyil.gov](mailto:james.flannery@cookcountyil.gov)> Subject: Re: Record on Appeal in  
> 1-18-0091: Quote requested

> Mr. Watts,

> Please do not have ex-parte communication with Judge Shelley. There are  
> other parties of record.

> Best,

> Christine Marinakis

> Case Coordinator

> Hon. Diane M. Shelley

> 1912 Richard J. Daley Center

> Chicago, IL 60602

> (312) 603-5940

> From: gww1210 <[gww1210@gmail.com](mailto:gww1210@gmail.com)>

> Sent: Monday, October 15, 2018 10:25 AM

> To: Patricia A. O'Brien (Circuit Court)

> Cc: Timothy Evans (Judiciary); James Flannery (Judiciary); Diane Shelley  
> (Judiciary); [Gww1210@aol.com](mailto:Gww1210@aol.com); [gww1210@gmail.com](mailto:gww1210@gmail.com)

> Subject: RE: Record on Appeal in 1-18-0091: Quote requested

>  
>  
>  
> Thank you, Patricia, for your speedy reply, replying even during your  
> time-off. Anyhow, since Illinois case law on Intervention is still current,  
> and since i am (very, very) indigent, my rights to sue or defend are are  
> being denied.  
> While i understand your limitations here, i am not unmindful that you are  
> ab attorney, and a very intelligent one at that, and, as such, you know that  
> the appeals court is blatantly wrong in its claims of lack of, for example,  
> jurisdiction to issue a Ruke  
> 321 order limiting the record to a manageable size, or appeallate authority  
> to uphold the John Hancock case cited below. Indeed, the elephant in the  
> room is that the court had authority then to hear an appeal on Intervention,  
> but not now? Oh, really? Things  
> like that generate a bad name for the judicial branch. Anyhow, yes, since  
> the docket alone is huge (takes several minutes to load on my slow  
> connections), the file would be huge, i am guessing, several thousand  
> dollars. If i had the money to pay for it, i  
> might pay for a full record, but to ask me to make a down payment without  
> kbowing full price not only violates my religious beliefs, as my Holy Book  
> requires i "count the cost" before diving in (Luke 14:25-34 of the Holy  
> Bible  
> <https://www.biblegateway.com/passage/?search=Luke+14%3A25-34&version=NIV> ),  
> but moreover, it is very unwise.

>  
>  
>  
> If the court thinks that John Hancock is no longer valid case law, or that  
> it has recently lost its Rule 321 appellate authority, who doesn't it issue  
> a ruling receding from these holdings or otherwise strike R.321 as invalid  
> or Unconstitutional?

>  
>  
>  
> I •did• fill out the form you described, and filed it with you, albeit sans  
> payment, because i am indigent, but i am willing to pay whay i can afford,  
> maybe a few hundred dollars. Your court would be better off getting some  
> money from me. If you don't  
> believe i filed the required paperwork to request prep of the record, look  
> at \*my\* docket, posted at these 2 mirrors, paying close attention to Exhibit  
> B of my 1/22/2018 filing in this case, a fee waiver application. I did make  
> a formal request to prepare  
> the record, several times,...see also my 1/19/2018 docketing statement, and  
> note exhibit B here also: Your court had the proper paperwork, and and want  
> of prosecution was not my fault. Observe:

>  
>  
>  
> <https://www.gordonwatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>  
> or:  
> <https://www.gordonwaynewatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

>  
>  
>  
> I can not blame you, Patricia, but neither am i to blame, and if i can't get  
> a fair day in court, then bot only is this denying my due process, it also

> harms the reputation of the court, which i hope to avoid, as i am not  
> spiteful or vengeful.  
>  
>  
>  
> In conclusion, if the courts reverse their heavyweight ruling, allowing me  
> to proceed In Forma Pauperis, they will get a glass half full, as i am  
> willing to pay something. If they force me to buy the whole record in this  
> open & shut case, you will have  
> to cobsider asking the clerk's office and/or the Chief Judge's office  
> (whomever oversees this) to try out my suggestion of allowing litigants to  
> access the same portal as the circuit judges, and use \*that\* as Common Law  
> Record (on appeal), which might not  
> only save my elderly friend's life, but certainly save your court millions  
> of dollars in man-hours of labour, since your office would not need to  
> prepare the Record on Appeal. Please inquire about both if my suggestions,  
> and please follow-up with me on this.  
> The current trajectory harms all parties immensely, and should be avoided  
> at all costs. Thank you, in advance, for your inquiry in this regard.  
>  
>  
>  
> Regardless of Judge Flannery's ruling, wrongly denying my rights to sue or  
> defend, I \*did\* fill out the formal request, and filed itwith the court, as  
> you requested. It's your move.  
>  
>  
>  
> P S.: Since i almost won the Terri Schiavo case ALL BY MYSELF, doing better  
> than Gov. Jeb Bush (he lost 7-0, and i lost 4-3 before the same panel of  
> Fla. Supreme Court justices... Google me or review the court's docket... ) i  
> think i know a bit about law,  
> more than most attorneys who did nowhere as well as me:  
>  
>  
>  
> <https://www.floridasupremecourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>  
>  
>  
>  
> compare with here, where Bush did far worse than me:  
>  
>  
>  
> <https://www.floridasupremecourt.org/clerk/dispositions/2004/10/04-925reh.pdf>  
>  
>  
>  
> With Kind Regards, I am, Sincerely,  
>  
>  
>  
> Gordon W. Watts  
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>  
>  
>



> Sent from my MetroPCS 4G LTE Android Device

>  
>  
>  
>  
>  
>

> ----- Original message -----

> From: "Patricia A. O'Brien (Circuit Court)" <paobrien@cookcountycourt.com>

> Date: 10/15/18 10:17 AM (GMT-05:00)

> To: Gordon Watts <gww1210@gmail.com>

> Cc: "Timothy Evans (Judiciary)" <timothy.evans@cookcountyil.gov>, "James

> Flannery (Judiciary)" <james.flannery@cookcountyil.gov>, "Diane Shelley

> (Judiciary)" <diane.shelley@cookcountyil.gov>, Gww1210@aol.com,

> "Gww1210@gmail.com" <gww1210@gmail.com>

>

> Subject: RE: Record on Appeal in 1-18-0091: Quote requested

>  
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> Good Morning Gordon,

>

> As you know from our numerous prior discussions, the Civil Appeals Division

> does not prepare Records on Appeal unless the Request for Preparation of

> Record on Appeal form has been efiled and the statutory fee paid.

>  
>

> Pursuant to Illinois Supreme Court Rule 321, you may only limit the Record

> on Appeal by stipulation of the parties or by order of court. Also, as you

> know, my division is required to prepare Records in accordance with the

> Supreme

> Court Rules and Standards for Preparation of Electronic Records- you are

> not able to direct us otherwise.

>

> We do not provide estimates in advance of the Record being prepared because

> we have no means to calculate it until the images have been reviewed and

> prepared. However, as you are well aware, this case is eleven years old and

> was

> several boxes in size many years ago.

>

> The Record on Appeal in this case will not be prepared by this Wednesday

> because you never filed your Request form.

>  
>

> Sent from

> Mail for Windows 10

>  
>  
>

> From: Gordon Watts <gww1210@gmail.com>

>

> Sent: Monday, October 15, 2018 4:45:01 AM

>

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

> To: Patricia A. O'Brien (Circuit Court); civilappeals (Circuit Court)

>

> Cc: Timothy Evans (Judiciary); James Flannery (Judiciary); Diane Shelley (Judiciary); [Gww1210@aol.com](mailto:Gww1210@aol.com); [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

>

> Subject: Record on Appeal in 1-18-0091: Quote requested

>

>

>

>

> CIVIL APPEALS DIVISION: Richard J. Daley Center, 50 West Washington

>

> St., Room 801

>

> Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri,

>

> Excl. Holidays

>

> Attention: Deputy Chief, Patricia O'Brian, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com)

>

>

>

> Cc: Chief Judge and assigned judges on Circuit Court level

>

>

>

> Attorney O'Brien:

>

>

>

> As you are aware, the Appeals Court has granted numerous extensions of

>

> time in my appeal of 2007-CH-29783, where I have asserted Rights of

>

> Intervention. While I'm very displeased (and rightly confused) that

>

> the court has claimed it somehow or another lacks appellate

>

> jurisdiction to limit the record on appeal or address intervention --

>

> in spite of clear case law to the contrary (see e.g., 05/03/2018 order

>

> of 1st Appellate Court where it disclaims jurisdiction "to order the

>

> Cir. Ct. to allow Watts leave to intervene, grant a fee waiver, or to

>

> prepare the record on appeal & transmit to App. Ct. in this matter

>

> (1-18-0572)," an appeal of Judge Flannery's order regarding the sister

>

> case, 1-18-0091 -- Contra: City of Chicago v. John Hancock Mutual

>

> Life Ins. Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984) -- which the

>

> 1st App.Ct. wrote on Intervention or, perhaps, Rule 321, which allows

>

> the Appellate Court to limit Contents of the Record on Appeal to only

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

>  
> a few Sine Qua Non required filings, sufficient for This Court to  
>  
> easily & quickly review & decide the case)...  
>  
>  
>  
> ...nonetheless, The First Appellate Court has mercifully & graciously  
>  
> extended time twice (the 3/28/18 order extending time to June 12,  
>  
> 2018, and the 07/25/18 order extending time to October 17, 2018 to  
>  
> file the record on appeal).  
>  
>  
>  
> I am aware of the limits of your authority, and you can rest assured  
>  
> that I'm not asking you to prepare a Rule 321 "limited" record (which  
>  
> can only be allowed by the circuit or appellate courts), but as both  
>  
> courts, in their infinite wisdom, have decided to deny my request for  
>  
> a limited record (which I might be able to pay for), this limits me to  
>  
> an "all or nothing" approach at my appeal... and let me remind you,  
>  
> Patricia, that a lot is riding on my appeal. Since Daniggelis'  
>  
> attorney has been want in prosecution of his appeal, it is dead, and  
>  
> mine is the only live case, and, if I lose, not only my "interests" in  
>  
> intervention are denied their day in court, but my elderly friend  
>  
> remains homeless, which, at his age, no doubt, jeopardizes his health  
>  
> and life.  
>  
>  
>  
> Therefore, I wish to get my fair day in court. To that end, while I  
>  
> know you can't do much else, I will ask you to do what you can do, and  
>  
> that is this: Please give me a quote, that is, an estimate, on the  
>  
> preparation of the record on appeal, which, by the way, is due this  
>  
> Wednesday, 17 October 2018, unless the court grants me another  
>  
> extension of time.  
>  
>  
>

> We just got evicted, and right before that, some nutcase drilled a  
>  
> half-inch drill into my gas tank, and I had to drop several thousand  
>  
> dollars into security cameras, motion lights, etc., and, being  
>  
> unemployed (we're being evicted, leaving me no time to work), those  
>  
> hardships took the monies I might have spent on a "full" record on  
>  
> appeal. Thus, I repeat my request: I request an estimate of the full  
>  
> record on appeal (or some method wherein I might purchase a partial  
>  
> record, which I might be able to afford).

>  
>  
> Alternatively, I propose that the record be posted electronically,  
>  
> without alteration (which would alleviate your clerks of the many  
>  
> hours of preparation), in other words, when I file a motion before,  
>  
> for example one of the judges in this Law Division case, the judges  
>  
> can read the full record electronically **\*\*without\*\*** your civil appeals  
>  
> division having to prepare **\*\*anything\*\***. If you did this for me, this  
>  
> would ((#1)) save me loads of monies ((#2)) possibly save elderly  
>  
> Daniggelis' life, as he was made homeless ((#3)) save your clerks  
>  
> hours of needless preparation and ((#4)) set precedent to save Cook  
>  
> County Circuit Court untold millions of dollars, since allowing  
>  
> citizens the same portal interface as judges would work: It worked for  
>  
> judges, and would work for litigants.

>  
>  
> Anyhow, the appeals court is probably wondering if I am slack in my  
>  
> desire to prosecute this case, but my email to you, and any response  
>  
> you might give, are slated to be put in my appendix in my upcoming  
>  
> Motion to Extend Time, so that I may show that I am not want for  
>  
> prosecution, as Mr. Daniggelis' attorney was. Thank you, in advance,  
>  
> for giving me a reasonable, moral, and fair quote to prepare the  
>  
> record in a timely manner, in this case which has dragged on for too

>  
 > many decades, in the which no one has shown cause why Daniggelis'  
 >  
 > house could be snatched from him, on admitted fraud (see my pleading  
 >  
 > where I quote Judge Otto) without him having been paid a dime.  
 >  
 >  
 >  
 > P.S.: No matter how frustrated I am with the 3 levels of court (which  
 >  
 > includes your Supreme Court's treatment of my recent motion in file  
 >  
 > #:123481), I must show proper **\*\*and complete\*\*** respect for the courts,  
 >  
 > particularly the appellate court, which has twice extended time to  
 >  
 > file the record, and to that end, I am making a special effort to  
 >  
 > grant the appeals court's request to get the record, and transmit it  
 >  
 > to them--in order to meet the court half-way, and do my part to make  
 >  
 > their jobs (they are people too, you know), as easy as is reasonably  
 >  
 > possible. And, if there is anything I can do to make *\*your\** job  
 >  
 > easier, I will, but I am maxed out on several levels, but to recap:  
 >  
 > Record on Appeal in 1-18-0091: Quote requested, and electronic  
 >  
 > miracles welcome, as described above.  
 >  
 >  
 >  
 > --  
 >  
 > \*Gordon Wayne Watts, editor-in-chief, The Register\*  
 >  
 > \*  
 > [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)\* <<http://www.gordonwaynewatts.com/>>\* / \*\*  
 >  
 > [www.GordonWatts.com](http://www.GordonWatts.com)\* <<http://www.gordonwatts.com/>>  
 >  
 > **\*A\*\*LWAYS FAITHFUL - To God\***  
 >  
 > \*BS, The Florida State University, Biological & Chemical Sciences  
 >  
 > AS, United Electronics Institute\*  
 >  
 > \*821 Alicia Road, Lakeland, FL 33801-2113  
 >  
 > Home: (863) 688-9880 **\*\*Work: (863) 686-3411 Voice&FAX: (863)**  
 >  
 > 687-6141**\*\*Cell: (863)409-2109**  
 >  
 > See also:

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>

> \*[Gww1210@aol.com](mailto:Gww1210@aol.com) ; [Gww12102002@Yahoo.com](mailto:Gww12102002@Yahoo.com) \*

>

> \*Truth is the strongest, most stable force in the Universe\*

>

> \*Truth doesn't change because you disbelieve it\*\*

>

> TRUTH doesn't bend to the will of tyrants

>

> **[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com)** <<http://www.gordonwaynewatts.com/>>\* / \*\*

>

> [www.GordonWatts.com](http://www.GordonWatts.com)\* <<http://www.gordonwatts.com/>>\*

>

> Get Truth.\*

>

> **"**First, they [Nazis] came for the Jews. I was silent. I was not a Jew.

>

> Then they came for the Communists. I was silent. I was not a Communist.

>

> Then they came for the trade unionists. I was silent. I was not a trade

>

> unionist. Then they came for me. There was no one left to speak for me."

>

> (Martin Niemöller, given credit for a quotation in The Harper Religious and

>

> Inspirational Quotation Companion, ed. Margaret Pepper (New York: Harper

>

> &Row, 1989), 429 -as cited on page 44, note 17, of Religious Cleansing in

>

> the American Republic, by Keith A. Fornier, Copyright 1993, by Liberty,

>

> Life, and Family Publications.\*

>

> \*Some versions have Mr. Niemöller saying: "Then they came for the

>

> Catholics, and I didn't speak up, because I was a Protestant"; other

>

> versions have him saying that they came for Socialists, Industrialists,

>

> schools, the press, and/or the Church; however, it's certain he DID say

>

> SOMETHING like this. Actually, they may not have come for the Jews first,

>

> as it's more likely they came for the prisoners, mentally handicapped, &

>

> other so-called "inferiors" first -as historians tell us -so they could get

>

> "practiced up"; however, they did come for them -due to the silence of

>

> their neighbors -and due in part to their own silence. So: **"**Speak up now

>

> or forever hold your peace!"-GWW

>

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>  
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>  
>  
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>

—  
\*Gordon Wayne Watts, editor-in-chief, The Register\*

\* [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) \* <<http://www.gordonwaynewatts.com/>>\* / \*\*  
[www.GordonWatts.com](http://www.GordonWatts.com) \* <<http://www.gordonwatts.com/>>

\*A\*\*LWAYS FAITHFUL - To God\*

\*BS, The Florida State University, Biological & Chemical Sciences  
AS, United Electronics Institute\*

\*821 Alicia Road, Lakeland, FL 33801-2113

Home: (863) 688-9880 \*\*Work: (863) 686-3411 Voice&FAX: (863)  
687-6141\*\*Cell: (863)409-2109

See also: \*\*[http://Gordon\\_Watts.Tripod.com/consumer.html](http://Gordon_Watts.Tripod.com/consumer.html)\* <[http://gordon\\_watts.tripod.com/consumer.html](http://gordon_watts.tripod.com/consumer.html)>

\*[Gww1210@aol.com](mailto:Gww1210@aol.com) ; [Gww12102002@Yahoo.com](mailto:Gww12102002@Yahoo.com) \*

\*Truth is the strongest, most stable force in the Universe\*

\*Truth doesn't change because you disbelieve it\*\*

TRUTH doesn't bend to the will of tyrants

\*\*[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) \* <<http://www.gordonwaynewatts.com/>>\* / \*\*  
[www.GordonWatts.com](http://www.GordonWatts.com) \* <<http://www.gordonwatts.com/>>\*

Get Truth.\*

\*\*"First, they [Nazis] came for the Jews. I was silent. I was not a Jew.  
Then they came for the Communists. I was silent. I was not a Communist.  
Then they came for the trade unionists. I was silent. I was not a trade  
unionist. Then they came for me. There was no one left to speak for me."  
(Martin Niemöller, given credit for a quotation in The Harper Religious and  
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&Row, 1989), 429 -as cited on page 44, note 17, of Religious Cleansing in  
the American Republic, by Keith A. Fornier, Copyright 1993, by Liberty,  
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\*Some versions have Mr. Niemöller saying: "Then they came for the  
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versions have him saying that they came for Socialists, Industrialists,  
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SOMETHING like this. Actually, they may not have come for the Jews first,  
as it's more likely they came for the prisoners, mentally handicapped, &  
other so-called "inferiors" first -as historians tell us -so they could get  
"practiced up"; however, they did come for them -due to the silence of  
their neighbors -and due in part to their own silence. So: "Speak up now  
or forever hold your peace!"-GWW

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



## E-Notice

2007-CH-29738

CALENDAR: W

To: Gordon Wayne Watts  
gww1210@gmail.com

---

# NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
GMAC MORTGAGE LLC v. YOUNES JOSEPH

The transmission was received on 04/20/2018 at 6:34 PM and was ACCEPTED with  
the Clerk of the Circuit Court of Cook County on 04/23/2018 at 8:55 AM.

**NOTICE OF REPORT OF RECORDS OF PROCEEDINGS (This is closest I can find to describe filing:  
I'm giving notice of report of proceedings in Appellate Court, which has issued order for my to  
direct inquiry to this court regarding Record on Appeal./)**

Filer's Email: gww1210@gmail.com  
Filer's Fax:  
Notice Date: 4/23/2018 8:55:26 AM  
Total Pages: 10

**DOROTHY BROWN**  
**CLERK OF THE CIRCUIT COURT**  
COOK COUNTY  
RICHARD J. DALEY CENTER, ROOM 1001  
CHICAGO, IL 60602

(312) 603-5031  
courtclerk@cookcountycourt.com



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC )  
Plaintiff, ) Case No.: 2007 CH 29738  
) (Transfer to Law Division)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

**Motion for Clarification concurrent with  
Rule 321 motion to limit Contents of the Record on Appeal**

In the exercise of the reviewing Court's appellate authority, the Appellate Court, First District, has entered an order, in *GMAC v. Watts*, 1-18-0091, that: "Appellant must direct inquiries on the content of the record on appeal to the Clerk of the Circuit Court of Cook County."

ORDER ENTERED MAR 28 2018, Appellate Court, First District.

Pursuant to the above-quoted/cited order (see *infra*: **Exhibit-A**), Appellant, Gordon Wayne Watts, now directs inquiry to This Court regarding the content of the record on appeal in 1-18-0091—**hereby moving for clarification** of whether or not the 7-7-2017 motion to Intervene stated sufficient grounds to intervene in the case at bar.

Moreover, in concurrent motion, Appellant, Watts, now moves this court to "order less" for the Record on Appeal, in accordance with Rule 321, notice, and proper hearing will having been given. [In support of this motion, Movant respectfully points out that a stipulation is highly unlikely given the fact that many parties can't even be located or have bad service addresses, and/or are unlikely to consent to anything, big or small, in this regard.]

Specifically, movant requests that the clerk prepare the limited record sought in the 3/16/2018 Motion for Extension of Time, in *GMAC v Watts*, 1-18-0091, a copy of which has been served upon this court in prior filings—and reproduced below, in the proposed order.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: **Friday, 20 April 2018**

**/s/Gordon Wayne Watts**  
**Gordon Wayne Watts**

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4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 2 of 10

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION**

GMAC Mortgage, LLC	)	
<b>Plaintiff,</b>	)	Case No.: 2007 CH 29738
	)	(Transfer to Law Division)
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

**ORDER**

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for Clarification and for preparation of a limited Record on Appeal, and, notice having been given, and the Court being fully advised in the premises:

**IT IS HEREBY ORDERED** that the Clerk of the Circuit Court of Cook County shall prepare the following record of appeal, without cost, to appellant, Gordon Wayne Watts, and transmit it to the IL First Appellate Court, in case number 1-18-0091—only the following lower court pleadings in the above-captioned case:

- All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals

ENTERED: \_\_\_\_\_  
Judge Diane M. Shelley, #1925  
Date: \_\_\_\_\_

Prepared by:  
Gordon Wayne Watts  
821 Alicia Road  
Lakeland, FL 33801-2113  
(863) 688-9880, (863) 409-2109

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4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 3 of 10

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC )  
Plaintiff, ) Case No.: 2007 CH 29738  
) (Transfer to Law Division)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that today, **Friday 20 April 2018**, I am causing to be filed with the Clerk of the Court of Cook County, Illinois, my **Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

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4/20/2018 6:34 PM  
2007-CH-29738  
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**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays, **[served by email only, as a courtesy, since they are not a party proper]**

\* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602, Courtesy copy via: [Timothy.Evans@CookCountyIL.gov](mailto:Timothy.Evans@CookCountyIL.gov) **[served by email only, as a courtesy, since he is not a party proper]**

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served in all ways, as Judge Flannery is a defendant]**

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) **[served in all ways, as Judge Shelley is a defendant]**

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

\* **Richard B. Daniggelis (who receives mail, via USPS mail-forwarding at his old address)** 1720 North Sedgwick St., Chicago, IL 60614-5722

\* **Andjelko Galic** Atty for Richard B. Daniggelis (Atty#:33013) C:312-217-5433, Fx:312-986-1810, Ph:312-986-1510, [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ; [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) 845 Sherwood Road, LaGrange Park, IL 60526-1547

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **MERS (Mortgage Electronic Registration Systems, Inc.)** <https://www.MersInc.org/about-us/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and Corporate Secretary for MERSCORP

**SERVICE LIST (continued)**

Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ;  
[SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with  
MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her  
as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ;  
[SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications  
Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ;  
[KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: MERS (Mortgage Electronic Registration Systems, Inc.),  
1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252  
208 S LASALLE, Suite #1860, CHICAGO IL, 60604

\* **Stewart Title, Attn: Leigh Curry**

<http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html>  
2055 W. Army Trail Rd., STE 110, Addison, IL 60101 [ph:(630) 889-4050]

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-  
1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington  
Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the  
instant appeal, but the undersigned can not find any more recent atty of record for defendant,  
LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The  
Court.]]

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E:  
[RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Paul L. Shelton**, *Pro Se*, (Atty. #15323, disbarred per IARDC)

E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363,  
Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC )  
Plaintiff, ) Case No.: 2007 CH 29738  
) (Transfer to Law Division)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

\* The undersigned Defendant-Appellant, Gordon Wayne Watts, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – this **Friday, 20 April 2018**, via **“Cook County E-File”** if they're e-file registered.

\* I'm concurrently serving all parties via **First Class U.S. Postal Mail** and/or FedEx 3rd-party commercial carrier.

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings **–online at my official websites, infra** –linked at the “Mortgage Fraud” story, dated Fri. 14 April 2017.

\* Lastly, I may, later, cc all parties via **e-mail**, if I am able.

*Respectfully submitted,*

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
821 Alicia Road, Lakeland, FL 33801-2113  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 7 of 10

**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* March 28, 2018 Order from the IL First appellate Court,  
directing Appellant to inquire in the instant motion

Exhibit-A

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 8 of 10



NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, ) Appeal from the Circuit Court of Cook County, IL  
Plaintiff )  
vs. ) No. 07 CH 29737  
) (Transfer into Law Division from Chancery)  
Gordon W. Watts, et. al., )  
Defendants ) Hon. Diane M. Shelley, Judge Presiding

ORDER

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for an extension of time, and, notice having been given, and the Court being ~~by~~ advised in the premises:

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to June 12, 2018, and, pursuant to ~~Rule 311(b)~~ [Rule 311 Accelerated Docket, (b) Discretionary Acceleration of Other Appeals], ~~this appeal is placed on accelerated track.~~ Pursuant to Rule 311(b), "The motion [to expedite] shall be supported by an affidavit stating reasons why the appeal should be expedited," and This Court notes that both the instant motion and prior pleadings by Appellant had either 'Verification' affirmations, or actual Sworn/Notarized affidavits, which compel The Court to accept at face value allegations that an accelerated appeal is necessary. [This court notes that Watts' claims on this head were never challenged as false.]

**IT IS FURTHERMORE ORDERED** that the trial court shall grant Movant's motion for Intervention, Grant his application for fee waiver, and prepare selected items described below:

This court finds, per Rule 311(b), that it is warranted by the circumstances, and This Court now enters a ruling that the trial court prepare only the following supporting record prepared pursuant to Rule 328, consisting only the following lower court pleadings:

- All lower court pleadings – and related "exhibits" – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) "Answer" briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals



# Law DIVISION

## Litigant List

Printed on 04/23/2018

Case Number: 2007-CH-29738

Page 1 of 2

### Plaintiffs

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GMAC MORTGAGE LLC			0000	
BANK AMERICA NA			0000	
CHICAGO VOLUNTEER LEGAL			0000	
LASALLE			0000	
US BANK NATIONAL ASSOCI			0000	

Total Plaintiffs: 5

### Defendants

Defendant Name	Defendant Address	State	Unit #	Service By
DANIGGELIS RICHARD			0000	
GORDON WAYNE WATTS			0000	
HLB MORTGAGE			0000	
INVEST ONE			0000	
LAROCQUE JOHN			0000	
LEGATEES			0000	
MOORE ROBERT			0000	

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

MORTGAGE ELECTRONICS RE 0000

NON RECORD CLAIMANTS 0000

PHONE ERIKA 0000

SHELTON PAUL 0000

STEWART TITLE ILLINOISZ 0000

TRUST ONE MORTGAGE 0000

UNKNOWN HEIRS 0000

UNKNOWN OWNERS 0000

YOUNES JOSEPH 0000

Total Defendants: **16**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



**Arrest Records: 2 Secrets**  
Instant Checkmate

Find Addresses, Phone Numbers, Felonies, Traffic Records, DUIs and Much More!

**OPEN**

## Ms Erika R Rhone Age 52

**Current Address**  
[22711 Southbrook Dr](#)  
[Sauk Village, IL 60411-4291](#)

**Phone Numbers**

[\(773\) 443-7150](#) - Wireless

[\(773\) 238-1440](#) - LandLine/Services

[\(773\) 326-7150](#) - Wireless

[Show Less...](#)

[\(773\) 552-6199](#) - Wireless

[\(773\) 288-0546](#) - LandLine/Services

- Full Background Report**
- Arrest Records
  - Court Records
  - Marriage & Divorce Records
  - Birth & Death Records
  - Police Records
  - Search Warrants
  - Criminal Records Data
  - Property Records
  - Bankruptcies, Judgments, Liens
  - Complete Background Check

**VIEW FULL BACKGROUND REPORT**

**Email Addresses**

[erregi@mail2.tread.net](#)

[erika.rhone@sbcglobal.net](#)

[erhone@mindspring.com](#)

[Show Less...](#)

[erika@grandkahn.com](#)

[erikarhone@sbcglobal.net](#)

[er5526199@aol.com](#)

**From:** Williams, Dawn <DWilliams@dykema.com>

**To:** gww1210@aol.com <gww1210@aol.com>

**Subject:** Automatic reply: Watts v. Flannery and Shelley (No.: 123481 IL Supreme Court), Motion to reconsider, and lower court filings

**Date:** Mon, Jul 23, 2018 6:17 am

Dawn Peacock is no longer with the firm. If your inquiry involves a Dykema related matter, please contact Justine Lewis at JLewis@dykema.com. If this is a personal matter, Dawn can be contacted at dpeacock@kentlaw.iit.edu. Thank you



**Dawn N. Williams**

Attorney

DWilliams@dykema.com

616-776-7518 Direct

616-776-7500 Main

855-234-8873 Fax

300 Ottawa Avenue, N.W., Suite 700

Grand Rapids, Michigan 49503

[www.dykema.com](http://www.dykema.com)

\*\*\* Notice from Dykema Gossett PLLC: This Internet message may contain information that is privileged, confidential, and exempt from disclosure. It is intended for use only by the person to whom it is addressed. If you have received this in error, please (1) do not forward or use this information in any way; and (2) contact me immediately. Neither this information block, the typed name of the sender, nor anything else in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**From:** gww1210 <gww1210@aol.com>

**To:** cdolan <cdolan@cohonraizes.com>

**Cc:** gww1210 <gww1210@aol.com>; gww1210 <gww1210@gmail.com>

**Bcc:** Gww12102002 <Gww12102002@yahoo.com>; gordonwaynewatts <gordonwaynewatts@aol.com>; gordonwaynewatts <gordonwaynewatts@hotmail.com>

**Subject:** Re: GMAC v. Daniggelis, et al.; Case No. 2007 CH 29738

**Date:** Thu, Jul 26, 2018 4:19 pm

---

My apologies, as I think you are right, Carrie, according to the PDF you attached. But, 2 questions:

1) what was image001.wmz I could not open it?

2) why does the court docket list that agreed order as ruled by Judge DeLort while your copy shows judge Otto as having ruled it? Links to the court docket are on my personal docket, and my smartphone and internet connection are too slow to send you a screenshot, but here is the link: <https://w3.courtlink.lexisnexis.com/cookcounty/Finddock.asp?DocketKey=CAAH0CH0CJHDI0CH>

I hope to order a copy of this doc from the court to see and verify your claim, and, if true, will amend and update my service list as you request.

Gordon

Sent from AOL Mobile Mail

-----Original Message-----

From: Carrie Dolan <cdolan@cohonraizes.com>

To: 'gww1210@aol.com' <gww1210@aol.com>

Sent: Thu, Jul 26, 2018 09:45 AM

Subject: GMAC v. Daniggelis, et al.; Case No. 2007 CH 29738

Dear Mr. Watts,

I am in receipt of your correspondence and your voicemail messages. My law firm appeared on behalf Third Party Defendant Stewart Title Company f/k/a Stewart Title of Illinois ("Stewart Title") in case 07 CH 29738. Third Party Plaintiff Richard Daniggelis had asserted causes of action against Stewart Title in Counts X and XI of his third party complaint. Mr. Daniggelis and Stewart Title settled Mr. Daniggelis's claims in 2012 and the court dismissed with prejudice Mr. Daniggelis's Counts X and XI against Stewart Title on November 9, 2012. I have attached a copy of the dismissal order to this email. As you will see from the order, it reads on the second page "As a result of the dismissal of Counts X and XI, Third party Stewart Title of Illinois n/k/a Stewart Title Company is no longer a party to this litigation."

Since Stewart Title is not a party to case number 07 CH 29738 and has not been a party for over 5 ½ years, it is not appropriate to serve pleadings in this matter, or appeals from this matter, on Stewart Title or me. Stewart Title is also not a party to your alleged action against Judge Flannery and Judge Shelley. Please cease adding Stewart Title and me to your service list.

Yours truly,  
Carrie



Carrie A. Dolan  
208 S. LaSalle St., Suite 1440  
Chicago, Illinois 60604-1261  
[CDolan@CohonRaizes.com](mailto:CDolan@CohonRaizes.com)

**P:** 312-726-2252    **F:** 312-726-0609    **D:** 312-658-2204

**PLEASE NOTE OUR NEW SUITE NUMBER!**

CONFIDENTIALITY NOTICE: The information contained in this message (including my attachments) is confidential and may contain privileged information. If you have received this message in error, please delete it immediately and notify the sender by e-mail. Thank you.

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

U.S. BANK NATIONAL ASSOCIATION, A )  
NATIONAL BANKING ASSOCIATION AS )  
SUCCESSOR TRUSTEE TO BANK OF )  
AMERICA, N.A., AS TRUSTEE FOR )  
MORGAN STANLEY LOAN TRUST 2006- )  
16AX, )

No. 07 CH 29738

Plaintiff, Counter-Defendant, )

v. )

RICHARD DANIGGELIS, )  
Defendant, Counter-Plaintiff, )

**Property address:**  
1720 N. Sedgwick  
Chicago, IL

JOSEPH YOUNES; MORTGAGE )  
ELECTRONIC REGISTRATION SYSTEMS )  
INC., AS NOMINEE FOR HLB MORTGAGE; )  
UNKNOWN HEIRS AND LEGATEES OF )  
JOSEPH YOUNES, IF ANY; UNKNOWN )  
OWNERS AND NON RECORD )  
CLAIMANTS; )

Defendants, Counter-Defendants, )

ERIKA RHONE; PAUL SHELTON; )  
STEWART TITLE OF ILLINOIS; JOHN )  
LAROCQUE; TRUST ONE MORTGAGE )  
CORPORATION; INVEST ONE, LLC; D&B )  
GROUP, )

Third Party Defendants. )

**Agreed Order**

This cause coming to be heard on the agreement of the parties and the court being advised in the premises that Counter-plaintiff Richard Daniggelis and Third-party defendant Stewart Title Company f/k/a Stewart Title of Illinois have settled all claims and controversies between them;

IT IS HEREBY ORDERED THAT:

1. Counts X and XI of the Third-Party Complaint are dismissed with prejudice. Each party to those counts shall bear their own costs; and

2. As a result of the dismissal of Counts X and XI, Third-party defendant Stewart Title of Illinois n/k/a Stewart Title Company is no longer a party to this litigation.

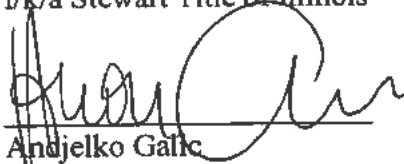
Date: November \_\_, 2012

ENTER:

Carrie A. Dolan  
COHON RAIZES & REGAL LLP (90192)  
208 S. LaSalle Street, Suite 1860  
Chicago, Illinois 60604  
(312)726-2252



Carrie A. Dolan  
Counsel for Stewart Title Company  
f/k/a Stewart Title of Illinois



Andjelko Galic  
Counsel for Richard Daniggelis

Judge

Judge Michael F. Otto

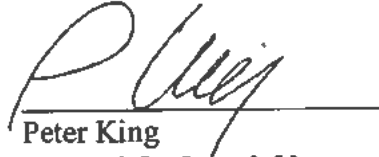
Judge's No.

NOV 09 2012

Circuit Court - 2065



Richard Indyke  
Counsel for U.S. Bank National Association,  
as successor trustee + Plaintiff



Peter King  
Counsel for Joseph Younes

## **Exhibit-K**

### **Exhibit “K” in this filing**

Obituary and Death Certificate for Defendant's father, Bobby Watts

(Please ignore other Exhibit notations in this copy/paste from the IL Supreme Court filing index in file 123481, where they were Exhibits B, C, and D)

## Obituary for Robert F. "Bobby" Watts

## Exhibit "B"

(source: The Ledger -- TheLedger.com)

### OBITUARIES



**ANDREW  
"HORSEHEAD"  
LAWRENCE, Jr.**

BARTOW - Andrew Lawrence, Jr., 82, died Fri., 5/4/18. View: at Gause F.H., 5-7 pm Fri, 5/11. Service at St. James AME Church at 1 pm on Sat., 5/12.



**ROBERT  
FRANKLIN  
DELANO  
"BOBBY"  
WATTS, 83**

LAKELAND - Robert Franklin Delano "Bobby" Watts, 83, died May 3, 2018. Bobby was born in Miami, FL on Jan. 27, 1935.

With the exception of a brief stint in the Navy, Bobby spent his entire life in Florida, working for the railroad, owning a gym

### "BOBBY" WATTS, 83

#### LAKELAND

Robert Franklin Delano "Bobby" Watts, 83, died May 3, 2018. Bobby was born in Miami, FL on Jan. 27, 1935.

With the exception of a brief stint in the Navy, Bobby spent his entire life in Florida, working for the railroad, owning a gym and auto parts stores. For 43 years he was the very proud owner of the Bobby Watts Speed Shop. One of his first jobs was with "Big Daddy, Don Garlits" the "King of Drag Racing."

Over his entire life he never missed a day of work except when he was in the hospital.

An avid drag racer as a young man, and harmonica player in his later years, he found happiness in his racing and music, and strength from his Savior Jesus Christ.

He is preceded in death by his parents, Loring M. Watts, Sr. and Iola "Mary" Whitlock Watts Wood, his brother Loring M. "Mickey" Watts, Jr. and his sisters Jessie Mattair and Janie Barnett.

Bobby is survived by his wife, Anne Watts and his son, Gordon Watts.

A memorial service will be held at 2 pm on Sat., May 12 at the Fellowship Church As-

sembly was with "Big Daddy, Don Garlits" the "King of Drag Racing."

Over his entire life he never missed a day of work except when he was in the hospital.

An avid drag racer as a young man, and harmonica player in his later years, he found happiness in his racing and music, and strength from his Savior Jesus Christ.

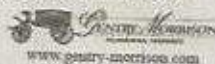
He is preceded in death by his parents, Loring M. Watts, Sr. and Iola "Mary" Whitlock Watts Wood, his brother Loring M. "Mickey" Watts, Jr. and his sisters Jessie Mattair and Janie Barnett.

Bobby is survived by his wife, Anne Watts and his son, Gordon Watts.

A memorial service will be held at 2 pm on Sat., May 12 at the Fellowship Church Assembly of God, 4405 N. Galloway Rd, Lakeland.

Condolences to the family may be given at [www.gentry-morrison.com](http://www.gentry-morrison.com).

In lieu of flowers, please follow Bobby's example and give to someone in need.



**NANCY LYNN  
MORGAN, 69**

AUBURNDALE

Thursday, May 10, 2018 A5



**GENEVA SMITH  
WOOTEN, 85**

APOPKA - Geneva Smith Wooten, 85, of Apopka, Florida passed away on May 05, 2018.

Mrs. Wooten was born on August 13, 1932. She graduated from Kathleen High School Class of 1950.

Mrs. Wooten is preceded in death by her sister Juanita S. Ruthven. She is survived by her loving husband of 59 years Mr. Edwin N. Wooten; her children Elaine Wooten Johnson, Sandra P. Wooten and The Honorable Wayne C. Wooten and his wife Tracey; sister Opal S. Carter; grandchildren Alexander Johnson, Chloe M. Johnson

# Obituary for Robert F. "Bobby" Watts

# Exhibit "C"

(source: The Register -- GordonWatts.com or GordonWayneWatts.com)



gordonwaynewatts.com

2



ogy / Spiritual)

[New: SEAN HANNITY section](#)

[April Mathis: World's Strongest Woman](#)

[Your ANGEL STORIES: Testimonials](#)

[LEGAL: Copyright; Terms & Conditions](#)

ise/Diet/CANCER

[ANGELS on ASSIGNMENT](#)

[New STAR TREK: PII episodes](#)

[More ANGEL Encounters](#)

[New: Terri Schiavo section](#)



ri.

Sat. 05

LLINOIS

[granted](#)

est for



## \* LAKELAND, FL - OBITUARIES

[\(Sat. 12 May 2018\) Robert Franklin Delano "Bobby" Watts \(01 Jan 1935 - 03 May 2018\)](#)

[Click here for obituary or to donate.](#)

## \* "The CONSERVATIVE Case for College Loan Bankruptcy bill H.R.2366"

(Sun. 25 Feb. 2017) Yes, the 'Conservative' argument for BK protection is even stronger than the 'Liberal' argument, so we don't know why the GOP supports these Constitutional rights more? *Details: [Video link with transcript & notes](#) \*\**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

## BUREAU of VITAL STATISTICS

## CERTIFICATION OF DEATH

STATE FILE NUMBER: 2018074517

DATE ISSUED: MAY 8, 2018

## DECEDENT INFORMATION

DATE FILED: MAY 8, 2018

NAME: ROBERT FRANKLIN DELANO WATTS

DATE OF DEATH: MAY 3, 2018

SEX: MALE

AGE: 083 YEARS

DATE OF BIRTH: JANUARY 27, 1935

SSN: 260-44-6565

BIRTHPLACE: MIAMI, FLORIDA, UNITED STATES

PLACE WHERE DEATH OCCURRED: DECEDENT'S HOME

FACILITY NAME OR STREET ADDRESS: 821 Alicia Road

LOCATION OF DEATH: LAKELAND, POLK COUNTY, 33801

RESIDENCE: 821 ALICIA ROAD, LAKELAND, FLORIDA 33801, UNITED STATES

COUNTY: POLK

OCCUPATION, INDUSTRY: OWNER/OPERATOR, RETAIL AUTO PARTS

EDUCATION: HIGH SCHOOL GRADUATE OR GED COMPLETED EVER IN U.S. ARMED FORCES? YES

HISPANIC OR HAITIAN ORIGIN? NO, NOT OF HISPANIC/HAITIAN ORIGIN

RACE: WHITE

## SURVIVING SPOUSE / PARENT NAME INFORMATION

(NAME PRIOR TO FIRST MARRIAGE, IF APPLICABLE)

MARITAL STATUS: DIVORCED

SURVIVING SPOUSE NAME: NONE

FATHER'S/PARENT'S NAME: LORING MITCHELL WATTS SR

MOTHER'S/PARENT'S NAME: IOLA WHITLOCK

## INFORMANT, FUNERAL FACILITY AND PLACE OF DISPOSITION INFORMATION

INFORMANT'S NAME: ANNE WATTS

RELATIONSHIP TO DECEDENT: EX-WIFE

INFORMANT'S ADDRESS: P. O. BOX 4225, PLANT CITY, FLORIDA 33565, UNITED STATES

FUNERAL DIRECTOR/LICENSE NUMBER: LEWIS H. HALL III, F021044

FUNERAL FACILITY: GENTRY MORRISON CREMATION CENTER F066603

1805 US 98 S, LAKELAND, FLORIDA 33801

METHOD OF DISPOSITION: CREMATION

PLACE OF DISPOSITION: GENTRY-MORRISON CREMATORY  
LAKELAND, FLORIDA

## CERTIFIER INFORMATION

TYPE OF CERTIFIER: Associate Medical Examiner

MEDICAL EXAMINER CASE NUMBER: 1810ME077

TIME OF DEATH (24 HOUR): FOUND AT 0520

DATE CERTIFIED: MAY 7, 2018

CERTIFIER'S NAME: VERA VASILIEVNA VOLNIKH

CERTIFIER'S LICENSE NUMBER: ME85865

NAME OF ATTENDING PHYSICIAN (IF OTHER THAN CERTIFIER): NOT ENTERED



STATE REGISTRAR

REQ: 2019270621

THE ABOVE SIGNATURE CERTIFIES THAT THIS IS A TRUE AND CORRECT COPY OF THE OFFICIAL RECORD ON FILE IN THIS OFFICE.

## WARNING:

THIS DOCUMENT IS PRINTED OR PHOTOCOPIED ON SECURITY PAPER WITH WATERMARKS OF THE GREAT SEAL OF THE STATE OF FLORIDA. DO NOT ACCEPT WITHOUT VERIFYING THE PRESENCE OF THE WATERMARKS. THE DOCUMENT FACE CONTAINS A MULTICOLORED BACKGROUND, GOLD EMBOSSED SEAL, AND THERMOCHROMIC FL. THE BACK CONTAINS SPECIAL LINES WITH TEXT. THE DOCUMENT WILL NOT PRODUCE A COLOR COPY.



\* 3 7 0 5 0 9 7 2 \*

DH FORM 1946 (03-13)

CERTIFICATION OF VITAL RECORD



## Exhibit-L

The September 28, 2018 rulings by the reviewing court, in which it, *inter alia*, claims that it does not have Mandamus jurisdiction **Exhibit-L**, in spite of the clear, plain meaning of Art.6, Sec.6, Ill.Const, and relevant case law. See September 28, 2018 order by reviewing court: “This cause coming on to be heard on the Court's Own Motion, and the Court being advised in the premises; IT IS HEREBY ORDERED that this Cause is DISMISSED for lack of this Court's jurisdiction.

ORDER ENTERED [] SEP 28 2018 [] APPELLATE COURT, FIRST DISTRICT

Enter:

/s/ Justice Mary Anne Mason

/s/ Justice Terrence J. Lavin

/s/ Justice Michael B. Hyman”

See: *Gassman v. THE CLERK OF THE CIRCUIT COURT OF COOK COUNTY* (1-15-1738) and *Midwest Medical v. Dorothy Brown* (1-16-3230), both of which are examples of Reviewing Court having the authority to issue Mandamus Writs, as Art.6, Sec. 6 of the ILLINOIS CONSTITUTION (sentence 3) clearly says: “The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review,” which, of course, includes Mandamus actions. The Gross Error justifies Federal Review of this motion, so as to offer a check & balance against legal discord.

1-18-0538

IN THE APPELLATE COURT OF ILLINOIS  
FIRST JUDICIAL DISTRICT

GORDON WAYNE WATTS,  
Plaintiff-Appellant,

v.

HON. JAMES P. FLANNERY, in his capacity  
as Presiding Judge, Law Division, Cook County,  
IL Circuit Court,  
Defendants-Appellees.

)  
)  
)  
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)  
)  
)  
)

**ORDER**

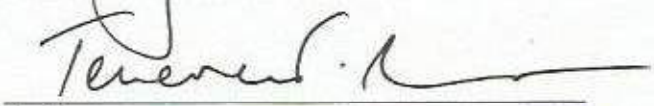
This cause coming to be heard on the Court's Own Motion, and the Court being advised  
in the premises;

**IT IS HEREBY ORDERED** that this Cause is **DISMISSED** for lack of this Court's  
jurisdiction.

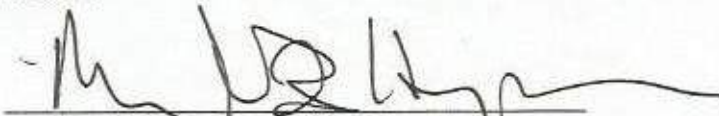
Enter:



Justice



Justice



Justice

**ORDER ENTERED**

SEP 28 2018

**APPELLATE COURT FIRST DISTRICT**

FILED DATE: 2/27/2019 7:28 PM 2007CH29738



THOMAS D. PALELLA  
CLERK OF THE APPELLATE COURT 1ST DISTRICT  
160 NORTH LASALLE STREET, RM 51400  
CHICAGO, ILLINOIS 60601

5 SLEUBAN  
IL 604  
23 SEP '18  
PM 41

neopost®  
09/28/2018  
FIRST-CLASS MAIL  
US POSTAGE  
\$00.472  
ZIP 60601  
041L11240569

1-18-0538

GORDON W WATTS  
821 ALICIA ROAD  
LAKELAND FL 33801

Rec'd by U.S. Postal  
Mail - Tue 22 October 2018  
-DNC



63601-211321

**Exhibit-M**

Eviction notice for Defendant, Gordon Wayne Watts (with cover-letter from the landlady).

(Showing hardship, among other things.)

*W. Wm. Ellsworth, Jr.*  
*Counsellor at Law*

*P O Box 7667*  
*Lakeland, Florida 33807-7667*  
*(863) 644-9197*  
*Fax: (863) 644-2785*

August 20, 2018

Anne M. Watts  
Gordon Watts  
P.O. Box 4225  
Plant City, FL 33563

Re: Notice of Lease Termination and Notice to Vacate  
That home and premises located at 821 Alicia Dr., Lakeland, FL 33801

Dear Mrs. Watts & Gordon,

As you are aware, the home that you are occupying needs extensive repairs due to Hurricane Irma damage and otherwise, and in this regard the City of Lakeland on 8/2/18 has cited Wingo Investment Corporation, the owner of the above property, with 3 citations requiring repair and upkeep which Gordon has copies of. Wingo does not intend to make these repairs but intends to demolish the premises.

Accordingly, please consider this a formal Notice of Lease Termination & Vacation on behalf of Wingo Investment Corporation, the owner of the above home and premises, which you are occupying on a month-to-month basis. To accommodate you in this regard, it is requested that you vacate on or before Saturday, December 1, 2018 by not only removing yourself from the premises but anything owned by you as the owner, Wingo Investment Corporation, intends to demolish the home you are occupying in December 2018 to remove it from the tax rolls as it has determined that it is not economically feasible to make the ongoing repairs as requested and otherwise.

In the meantime, no rent will be charged you from September 1<sup>st</sup> until you vacate, and it would be appreciated if that might be early prior to December 1<sup>st</sup> with Notice of Vacation be given to Doris W. Ellsworth, President of Wingo Investment Corporation.

Sincerely,

W. Wm. Ellsworth, Jr.

Copy: 821 Alicia Drive  
Lakeland, FL 33801

Dennis Browning  
City of Lakeland  
Code Enforcement Officer  
dennis.browning@lakelandgov.net



Gordon Watts &lt;gww1210@gmail.com&gt;

## 8/ 0/18 Notice of Lease Termination and Notice to Vacate that home and premises located at 821 Alicia Dr., Lakeland, FL 3801

Gordon Watts &lt;gww1210@gmail.com&gt;

Fri, Aug 4, 2018 at 10:12 AM

To: deewingo@aol.com

Cc: "Gww1210@aol.com" &lt;gww1210@aol.com&gt;, Gordon Watts &lt;gww1210@gmail.com&gt;,

"Gww12102002@yahoo.com" &lt;gww12102002@yahoo.com&gt;, Gordon Watts &lt;gordonwaynewatts@aol.com&gt;, Gordon Watts &lt;gordonwaynewatts@hotmail.com&gt;

Thank you for the clarification on both points. Mom wanted to keep the water heater, even though I don't know if we will need one - or if it is easily movable. Things like my wall-unit air conditioner, however, are probably useful. Also, you make a good argument about how you have been generous to us, both in the past and this time with regard to the free rent in our closing months, and I'll be sure to call mom right now and update her on both points. Gordon

On Thu, Aug 23, 2018, 3:38 PM &lt;deewingo@aol.com&gt; wrote:

Dear Gordon,

Responding to your email of 8/21/18 received on 8/2/18:

1. I forgo to tell you that upon timely vacating the premises you and/or your mom may take from the above premises at no cost to you anything contained within or may be attached to it if it will help you with your move to your Plant City house. This would include but not be limited to appliances, light fixtures, air conditioning unit, and any materials that may be salvageable and could be used by you.
2. The 12/1/18 date required for the premises to be vacated is 3 months and 10 days from the Notice to you which is more than sufficient for that purpose. Additionally, any moving expenses can be offset by the 3 months rent you will not be paying. Consequently, your date of vacating of 12/1/18 is non-negotiable, and I intend shortly to be contracting for the premises demolition on that date as the premises must be demolished before 12/31/18 in order to be excluded from the County and City tax roll for 2019 taxes.

Thank you,

Doris W. E Isworth

--Original Message--

From: Gordon Watts &lt;gww1210@gmail.com&gt;

To: deewingo &lt;deewingo@aol.com&gt;

Cc: Gww1210@aol.com &lt;gww1210@aol.com&gt;; Gordon Watts &lt;gww1210@gmail.com&gt;;

Gww12102002@yahoo.com &lt;gww12102002@yahoo.com&gt;; Gordon Watts &lt;gordonwaynewatts@aol.com&gt;;

Gordon Watts &lt;gordonwaynewatts@hotmail.com&gt;

Sent: Wed, Aug 22, 2018 3:48 am

Subject: Fwd: Notice of Lease Termination and Notice to Vacate That home and premises located at 821 Alicia Dr., Lakeland, FL 3801

Thank you for your timely notice, Doris, but for important matters, please remember I have several email addresses, and I regularly check both "gww1210" addresses. I am sorry to get evicted, but probably, you are right - have a home and I should live in a home we own, versus renting. \* \* \* GOOD NEWS: When mom was mentioning hiring a general contractor, yesterday (Tue 21 Aug 2018), I asked her why she would need one if she plans to sell her house, and she said - ha - she changed her mind & wants to keep it. See, I told you - ha

miracles were possible!.. When I asked her when & why she changed her mind, she said that she changed her mind this past Friday (Aug 17, 2018), and it was because you evicted us (giving her a wakeup call to reality, and proving us both right that her house is in better condition). She \*did\* say that three (3) months may not be enough, and that she would pay for the 4th and extra month. While I think that it \*will\* be enough, her concern is not without reason: When dad's landlord (Sun T. Chene) asked me to remove our stuff & vacate the shop, I unexpectedly landed in the emergency room after nearly bleeding to death from a reaction to over-the-counter meds, thus delaying me. While this is unlikely to happen again, this is a reminder that unexpected delays can come up. I hope & think that giving us til Dec 01 will be enough, so I will not cross any other bridge til I come to it. My biggest retest is that you didn't drop the hammer sooner, but better late than never. I think things will work out; thank you for your efforts. I did call Mike Kennedy, and he thinks he will have time to sit down with me, you, and mom, and brainstorm options & solutions. Meantime, I continue to work 'round the clock to safely vacate myself & belongings without incurring a false arrest at the hands of my mother for moving her belongings without her authorization. All This will be a challenge, and time will tell, but thanks for your efforts & assistance thus far.

Gordon Wayne Waits

----- Forwarded message -----

From: <deewingo@aol.com>

Date: Aug 20, 2018 11:04 AM

Subject: Notice of Lease Termination and Notice to Vacate That home and premises located at 821 Alicia Dr., Lakeland, FL 33801

To: <gww1210@gmail.com>

Cc:

Dear Gordon,

Please see attached.

Thank you,

Doris W. Emsworth

----- Forwarded message -----

From: <deewingo@aol.com>

Date: Aug 20, 2018 11:04 AM

Subject: Notice of Lease Termination and Notice to Vacate That home and premises located at 821 Alicia Dr., Lakeland, FL 33801

To: <gww1210@gmail.com>

Cc:

Dear Gordon,

Please see attached.

Thank you,

Doris W. Emsworth

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

**Exhibits – N, O, P, and Q**  
**(Relating to the FOUR (4) well water pumps)**

**Exhibit – N**

**TECO (Tampa Electric Company) complain cover letter**

**Exhibit – O**

**10-03-2018 receipt for second (2nd) pump put in for \$3,114.80.**

**Exhibit – P**

**01-09-2019 receipt for third (3rd) pump put in for \$375.00, labour only.**

**Exhibit – Q**

**Quote for fourth (4th) pump, for parts only, for \$1,620.85.**

Tampa Electric Company       Peoples Gas System       New Mexico Gas Company

Name: (First) **Gordon** (MI) **W.** (Last) **Watts**

Mailing Address: **2046 Pleasant Acre Drive**

City, State, Zip: **Plant City, FL 33566-7511**      Location of incident (if different from mailing address): **n/a**

Phone: ( ) **(863) 687-6141 [my cell]**      Alternate Phone: ( ) **(863) 688-9880 alt. cell**  
**(813) 495-4709 (Mom's cell)**

Account is listed under what name? **Anne Watts**

Account number: **211001469959**      Meter number: **H 3 5 6 9 7**

Date of incident (required): (Month) (Day) (Year) **Tue. 08 Jan. 2019 --and-- Sun. 27 Jan. 2019**

Did you place a call to Customer Service?  Yes  No      Did we respond?  Yes  No

Please summarize the details of this incident: **Bad ground and/or hot wires caused LOTS of flickering and dimming of lights & burnt up two (2) pumps. We got a BRAND NEW pump on Wed. 03 Oct. 2018, and moved into the house in early December. I, personally, reconnected the ground wire (which reduced dimming effects of heavy draw items, like heaters), but unbeknownst to me, TECO's service ground was DISCONNECTED. First pump burnt up shortly thereafter. Clark's replaced pump, and it burnt up too. We called TECO, who put in new service lines. Dimming effects stopped; we seek reimbursements.**

Please provide the details of the damages you sustained (attach an additional page if needed).

Item	Brand/Model # (required)	Age (required)
<b>Pump and relay box</b>	<b>GRUNDFOS / unknown model # - 0 . 5 hp</b>	<b>3 months</b>
<b>Another pump &amp; relay box</b>	<b>same make / model as above</b>	<b>19 days</b>

NOTE: I looked on the data sheet provided to us, and it does not show exact model number, but I think it is an SQ2 or SQ3 model, 240-volt, 1/2 horsepower motor. I got 19 days life for 2nd pump by subtracting January 8 from January 27, and I suspect 1st pump last LOTS longer before burning up because we didn't move into the house & start using heavy draw items (space heaters) until early December. The lack of a service neutral meant that there was lots of voltage on the well ground wire, which we think burnt up the delicate electronic circuitry inside the pump when we clicked on space heaters, which grounded thru the pump, itself!

While houses, in the past, grounded through the pump, nowadays, there's lots of delicate circuitry in the newer pumps. And, since two (2) GRUNDFOS pumps burnt up in a very short period of time, odd for a VERY good brand name, and leader in the industry, we think it was the house wiring, not "bad luck" of the pump. We paid \$375.00 for the labour on the 1st pump (which was warranted for parts, but not labour). The pump guy gave us a quote of \$1,620.85 for the 2nd pump's replacement (they would not pay for the 2nd pump, as the autopsy they performed on the 1st pump suggested it was the bad house wiring, not a faulty pump). That is at least \$1,995.85 that we are out because TECO's service ground and/or hot wires were very old and bad. However, there is no guarantee that there will not be additional labour costs. Moreover, we are still out water, and can't take showers, flush toilet, do laundry, get drinking water, etc. The pain & inconvenience & uncertainty mean we lost slightly over two (2) thousand dollars, sum total, and that is only a Conservative lower estimate.

Lastly, before I put in the ground, turning on even a small lightbulb would cause "dimming" effects (half the house got dimmer, as it loaded down the circuit, and the other half the house got brighter, as it "pulled the ground" farther away, causing the voltage to start approaching 230 or 240 volts). As you might expect, we burnt up some sensitive LED house lights, but I realise & admit that Wal-Mart reimbursed me for those losses, and therefore, I am honour-bound (see the terms, right below) to NOT seek reimbursement for those losses. But, I add this recollection to verify that over-voltage or under-voltage (the latter of which is alleged in the pump problem, as well as putting voltage on the circuitry when there was a "bad" TECO service ground) can (and does) damage electronic equipment and appliances. [[ Please excuse any spelling errors, as Microsoft's PAINT doesn't have spell-check. ]]

I certify that the expenses for which I am seeking reimbursement from TECO Energy, Inc. have been incurred by me. I further certify that these expenses have not been reimbursed, nor shall reimbursement be sought from any other company. I agree to submit and retain sufficient documentation for any expense for which I seek reimbursement.

Any person who, with the intent to injure, defraud, or deceive any insurer or insured, prepares, presents, or causes to be presented a proof of loss or estimate of cost or repair of damaged property in support of a claim under an insurance policy knowing that the proof of loss or estimate of claim or repairs contain any false, incomplete, or misleading information concerning any fact or thing material to the claim, commits a felony of the third degree, punishable by law.

Signature  Monday, 04 February 2019      Rev. 03-2017

Property Owner       Tenant

**Gordon Wayne Watts**      PH: (863) 687-6141 (work) (863) 688-9880 (cell)  
**A.S. United Electronic Institute (Valedictorian)**  
**B.S. The Florida State University (Biological & Chemical Sciences, double major with honours)**  
**2046 Pleasant Acre Drive**      (813) 495-4709 (cell phone for landlady, my mother, Anne Watts)  
**Plant City, FL 33566-7511**      GordonWatts.com      --or--      GordonWayneWatts.com  
    Gww1210@AOL.com      --or--      Gww1210@Gmail.com

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

# CLARK'S PUMP & WELL SERVICE, LLC.

CELL 813.384.1022  
OFFICE 813.957.3695



CUSTOMER TELEPHONE NO. (863) 687-6141 (cell)  
 NAME Gordon Wayne Watts  
 ADDRESS 821 Alicia Rd (Lakeland FL 33801-2113)  
 CITY, STATE, ZIP 2046 Pleasant Hill Dr, Plant City, FL 33562 (home)  
 DATE WEDNESDAY, 10-3-18  
 TECH NAME Troy

SOLD BY CASH C.O.D. CHARGE ON ACCT. MDSE. RETD. PAID OUT

QUAN.	DESCRIPTION	PRICE	PRODUCT
1	3" sub		Pump
2	20g tank		Tank
3	40-60		Switch
4	N/A		Control Box
5	0-100		Gauge
6	RC set		Plumbing
7	sub		Check Valve
8	20 feet		Wire
9			Service Cell
10	Trest	1500	Crane
11	set	1685.00	Parts
12	R Ren	7800.00	Labor
		8314.00	
			Warranty
			Tank
			Pump

Memo: 2y ON Date  
 1y SA Date  
 Remove set and block in well  
 on 3" well sub pump at 65 feet

RECEIVED BY Gordon Wayne Watts  
 All Sales Are Final. No Refund. Only Warranty. Labor not included.

KEEP THIS SLIP FOR REFERENCE

FILED DATE-2/27/2019 7:28 PM 2007CH29738

A-4705  
T-46528

07-11



# CLARK'S PUMP & WELL SERVICE, LLC.

0101

CELL 813.384.1022  
OFFICE 813.957.3695



CUSTOMER TELEPHONE NO. 913-475-4709 DATE 1-9-19

NAME Anne M. Watts TECH NAME \_\_\_\_\_

ADDRESS 2046 Pleasant Acres Dr (P.O. Box) 4225

CITY, STATE, ZIP Plant City, Fl. 33506 or 33563

SOLD BY \_\_\_\_\_ CASH \_\_\_\_\_ C.O.D. \_\_\_\_\_ CHARGE \_\_\_\_\_ ON. ACCT. \_\_\_\_\_ MDSE. RETD. \_\_\_\_\_ PAID OUT \_\_\_\_\_

QUAN.	DESCRIPTION	PRICE	PRODUCT
1	Truck, Labor		Pump
2			Tank
3			Switch
4			Control Box
5			Gauge
6			Plumbing
7			Check Valve
8			Wire
9			Service Cell
10			Crane
11			Parts
12		\$375	Labor
		Total	\$375.00
			Warranty
			Tank
			Pump

Memo:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

RECEIVED BY Anne M. Watts  
All Sales Are Final. No Refund. Only Warranty. Labor not included.

A-4705  
T-46528

01-11

KEEP THIS SLIP FOR REFERENCE

FILED DATE-2/27/2019 7:28 PM 2007CH29738



**Billy Clark**

+18133841022



Sunday, January 27, 2019

6:53 PM

Billy, here is our address again.  
2046 Pleasant Acre Drive, plant  
city

Monday, January 28, 2019

Read  
4:41 PM

Billy, before it gets to 5pm,  
I wanted to see what, of  
anything, Grundfos said about  
what killed the last pump.

B

Pump cost 1620.85

We will fix it just to help yall out  
this time

Just need cost of pump

4:53 PM

Read  
4:54 PM

Thx. Will talk to mom. But isn't  
24 g wire ok for that pump. My  
friend said it was, but i don't  
have specs page pulled up. Thx  
for info here.

B

To small for pump we will run  
14g

4:55 PM



Enter message



SEND



## **Exhibit-S**

**Judge Flanney's Order, dated March 01, 2018 (on docket in this Law Division case) that this court never granted leave to intervene (participate, his words), based, of course, on the wrongly-ignored motion to intervene, and become a party, based on ILLINOIS basic rights to “sue and defend.”**

This form is approved by the Illinois Supreme Court and is required to be accepted in all Illinois courts.

STATE OF ILLINOIS,  
CIRCUIT COURT  
Cook COUNTY

APPLICATION FOR WAIVER OF  
COURT FEES

For Court Use PAGE 1 of 9  
CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
LAW DIVISION  
CLERK DOROTHY BROWN

- Instructions**
- Enter above the county name where the case was filed.
  - Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.
  - Enter the name of the person being sued as Defendant/Respondent.
  - Enter the Case Number given by the Circuit Clerk or leave this blank if you do not have one.

GMAC Mortgage, LLC  
 aka "US Bank, NA," etc.  
 Plaintiff / Petitioner (First, middle, last name)

v.  
Richard B. D'Amico, Gordon Wayne Watts,  
 Joseph Yarns, Paul L. Sifton, et. al.  
 Defendant / Respondent (First, middle, last name)



2007-CH-29738  
 LAW Division  
 (Transfer from Chancery)  
 Case Number

- In 1a, enter your full name. If you are completing this form on behalf of a minor or an incompetent adult, provide that person's information.
- In 1b, only enter the year you were born. DO NOT enter your entire date of birth.
- In 1c, enter your complete current address.
- In 2a, enter the number of people age 18 and older living in your house who you support. Support means that the people rely on you financially.
- In 2b, enter the number of people under age 18 living in your house who you support.
- In 3, check "Yes" if you have received at least 1 of the benefits listed in the past 4 weeks.
- If you check "Yes" in 3, skip 4 and sign the form.

Pursuant to Illinois Supreme Court Rule 298 and 735 ILCS 5/5-105, I state:

- I am providing the following information about myself:
  - Name: Gordon Wayne Watts  
First Middle Last
  - Year of Birth: 1966
  - Street Address: 821 Aticia Road  
 City, State, ZIP: LAKELAND, Florida 33801-2113
  - I believe I cannot afford to pay the court fees in this case.
- I am providing the following information about people who live with me:
  - I support 0 adults (not counting myself) who live with me.
  - I support 0 children under 18 who live with me.
- I have received 1 or more of the benefits listed below in the past 4 weeks:
 

Yes  No

  - Supplemental Security Income (SSI) (Not Social Security)
  - Aid to the Aged, Blind and Disabled (AABD)
  - Temporary Assistance to Needy Families (TANF)
  - State Children & Family Assistance
  - Food Stamps (SNAP) ← Yes - See attached documentation
  - General Assistance (GA)
  - Transitional Assistance

5387

"If you answered "Yes" in section 3, skip section 4 and sign the form."

FILED DATE: 2/27/2019 7:28 PM 2007CH29738

Enter the Case Number given by the Circuit Clerk: 2007-CH-29738

2007-CH-29738 LAW Division (Transfer)

In 4a, check "Yes" if you have applied for at least 1 of the benefits listed in section 3.

4. I checked "No" in section 3, so I am providing the following financial information:

a. I have applied for 1 or more of the benefits listed in section 3:

Yes  No

from  
Cherry

b. I receive the following money each month. This includes money received by people I support who live with me. (check all that apply)

<input type="checkbox"/> My employment:	\$ _____	<input type="checkbox"/> Other people's employment:	\$ _____
<input type="checkbox"/> Child support:	\$ _____	<input type="checkbox"/> Social Security (not SSI):	\$ _____
<input type="checkbox"/> Pension:	\$ _____	<input type="checkbox"/> Unemployment:	\$ _____
<input type="checkbox"/> Other (list type and amount):	_____		\$ _____
<input type="checkbox"/> No income			

Total of all money received: \$ \_\_\_\_\_

c. I received the following total amount of money in the past 12 months. This includes money received by people I support who live with me. (check all that apply)

<input type="checkbox"/> My employment:	\$ _____	<input type="checkbox"/> Other people's employment:	\$ _____
<input type="checkbox"/> Child support:	\$ _____	<input type="checkbox"/> Social Security (not SSI):	\$ _____
<input type="checkbox"/> Pension:	\$ _____	<input type="checkbox"/> Unemployment:	\$ _____
<input type="checkbox"/> Other (list type and amount):	_____		\$ _____
<input type="checkbox"/> No income			

Total of all money received: \$ \_\_\_\_\_

d. My current monthly expenses are listed below. This includes the monthly expenses of the people I support who live with me. (check all that apply)

<input type="checkbox"/> Rent:	\$ _____	per month
<input type="checkbox"/> Home Mortgage:	\$ _____	per month
<input type="checkbox"/> Other Mortgage:	\$ _____	per month
<input type="checkbox"/> Utilities:	\$ _____	per month
<input type="checkbox"/> Food:	\$ _____	per month
<input type="checkbox"/> Medical:	\$ _____	per month
<input type="checkbox"/> Car Loan:	\$ _____	per month
<input type="checkbox"/> Other (list type and amount):	_____	\$ _____ per month

I have no expenses

Total of all expenses: \$ \_\_\_\_\_

In 4b, check the box for each type of money you have received in the past month. Also enter the gross (before taxes) amount for each type.

Include the money received by the people you support who live with you. Support means that the people rely on you financially.

In 4c, check the box for each type of money you have received in the past 12 months. For each type, enter the total amount received in the past 12 months before taxes.

Include the money received by the people you support who live with you.

In 4d, check all of your expenses for the past month and list the monthly amounts.

Include the expenses of the people you support who live with you.

ELECTRONICALLY FILED

1/22/2018 6:33 PM  
2007-CH-29738  
PAGE 2 of 9

Enter the Case Number given by the Circuit Clerk: 2007-CH-29738

2007-CH-29738 LAW Division (Transfer from Chancery)

In 4c, check all of the items owned by you and list the value of each item. Include the items owned by the people you support who live with you.

If you own real estate, include the total you owe on any mortgage.

e. I have the belongings listed below. This includes the belongings of the people I support who live with me. (check all that apply)

Bank accounts and cash totaling: \$ \_\_\_\_\_

Home real estate, worth: \$ \_\_\_\_\_

The total I owe on my home mortgage is: \$ \_\_\_\_\_

Other real estate, not including the house I live in, worth: \$ \_\_\_\_\_

The total I owe on my other mortgage is: \$ \_\_\_\_\_

1<sup>st</sup> vehicle worth: \$ \_\_\_\_\_ The 1<sup>st</sup> vehicle is paid off:  Yes  No

2<sup>nd</sup> vehicle worth: \$ \_\_\_\_\_ The 2<sup>nd</sup> vehicle is paid off:  Yes  No

Other (list items and value): \_\_\_\_\_ \$ \_\_\_\_\_

None of the above

I certify that everything above is true and correct to the best of my knowledge. I understand that making a false statement in this form could be perjury.

Gordon Wayne Watts  
Your Signature

321 Alvin Road  
Street Address

Gordon Wayne Watts  
Print Your Current Name

LAKELAND FL 33801-2113  
City, State, ZIP

N/A  
Relationship to Minor or Incompetent Adult (if applicable)

(863) 688-9880 (Home)  
Telephone  
(863) 409-2109 (Cell)

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

The person who filled out this form must sign it.

Enter the complete current address and telephone number of the person who filled out this form.

If you are filling out this form for a minor or an incompetent adult, state your relationship.

ELECTRONICALLY FILED  
1/22/2018 6:33 PM  
2007-CH-29738  
PAGE 3 of 9

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC Mortgage, LLC

Plaintiff/Petitioner

v.

Gordon Wayne Watts- Petitioner

Defendant/Respondent

No. 07 CH 29738 (transferred to law)

Calendar

ORDER

This matter coming before the Court on an Application and Affidavit to Sue or Defend as an Indigent Person, the Court being fully advised in the premises, IT IS HEREBY ORDERED;

Pursuant to Supreme Court Rule 298 and 735 ILCS 5/5-105:

The applicant is permitted to sue or defend without payment of fees, costs or charges. Fees for the reproduction of any documents contained in the court file or the electronic docket are not waived without specific order of court. The applicant may be ordered to pay any portion of the waived fees or costs out of a settlement or judgment resulting from this action.

The application is denied for the following reason(s): PETITIONER NEVER RECEIVED LEAVE OF COURT TO PARTICIPATE IN THIS CASE. THEREFORE, PETITIONER IS NOT A PARTY TO THIS MATTER. FURTHER, THIS CASE IS DISPOSED OF PURSUANT TO THE ORDER OF 7-10-17 (Attached).

Payment shall be: made by OR deferred until OR other

JUDGE JAMES P. FLANNERY

MAR 01 2018

Circuit Court-1505

ENTERED:

Dated:

Handwritten signature and number 1505

Judge

Judge's No

Payment should be made by cash, money order or cashier's check, directly to the Clerk of the Circuit Court of Cook County at the courthouse where you filed your application.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FILED DATE: 2/27/2019 7:28 PM 2007CH29738